

United States Department of the Interior Bureau of Land Management

**Finding of No Significant Impact
Environmental Assessment
DOI-BLM-UT-0300-2010-0008-EA**

May 13, 2011

Programmatic Environmental Assessment for Organized Group Activities along Hole-in-the-Rock Road

Location: Hole-in-the-Rock Road Corridor in Garfield County and Kane County, Utah. Site-specific locations include: Tenmile Wash Corral, Devil's Garden, Twentymile Wash, Countyline, Big Hollow Windmill, Fortymile Ridge, Dance Hall Rock Historic Site, and Sooner Wash.

***Grand Staircase – Escalante National Monument
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FINDING OF NO SIGNIFICANT IMPACT
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Programmatic Environmental Assessment for Organized
Group Activities along Hole-in-the-Rock Road

INTRODUCTION:

The Bureau of Land Management (BLM) has conducted an environmental analysis (DOI-BLM-UT-0300-2010-0008-EA) for a proposed action to address the issuance of organized group permits along the Hole-in-the-Rock Road Corridor in Garfield and Kane Counties that exceed existing group number limits. The project could allow a maximum of 395 people at any one time to conduct both day use organized group activities at Dance Hall Rock and Hole-in-the-Rock Historic sites, as well as camping within the Monument. The environmental assessment identified criteria to be required of all permitted parties. The permitted group criteria includes: predetermined camp locations, sanitation facilities to be provided by the permit holder, a maximum of up to 79 vehicles per group, a length of stay of six days and five nights for large groups and fourteen days for re-enactment/equestrian groups, and season of use and site restrictions would be applied to specific sites. The underlying need for the proposal would be met while accomplishing the following objectives:

1. Provide opportunities for organized groups and heritage activities along the Hole-in-the-Rock Road corridor in Garfield and Kane Counties that exceed current management prescriptions
2. Provide for the greatest enjoyment of the landscape, while protecting the environment and preventing expansion of existing disturbed areas

The Hole-in-the-Rock Road in Garfield and Kane Counties is approximately 61 miles long and lies within the Passage Zone designated in the Monument Management Plan. Two historical sites are present along the road; Dance Hall Rock and Hole-in-the-Rock. These sites and the region have significant meaning for members of The Church of Jesus Christ of Latter-day Saints (LDS), as it is the location of the 1879-80 San Juan Mission expedition from Parowan to Bluff, Utah.

DOI-BLM-UT-0300-2010-0008-EA is attached and is incorporated by reference for this Finding of No Significant Impact (FONSI). A no action alternative and two action alternatives were analyzed in the EA.

FINDING OF NO SIGNIFICANT IMPACT:

Based upon a review of the EA and the supporting documents, I have determined that the project is not a major federal action and will not significantly affect the quality of the human environment, individually or cumulatively with other actions in the general area. No environmental effects meet the definition of significance in context or intensity as defined in 40 CFR 1508.27. Despite the sensitivity of the area (i.e., context), impacts would not be significant because the intensity of the impacts discussed below is low. Impacts do not exceed those described in the Grand Staircase – Escalante National Monument MMP/FEIS. Therefore, an environmental impact statement is not needed.

This finding is based on the context and intensity of the project as described:

Context: The project is a programmatic action involving BLM administered lands that are of national importance. In addition, this project is locally and regionally important to members of The Church of Jesus Christ of Latter-day Saints (LDS), as it is a segment of the larger Hole-in-the-Rock Trail associated with the location of the 1879-80 San Juan Mission expedition from Parowan to Bluff, Utah. This project would allow organized and heritage groups the opportunity to have a cultural and educational experience, while providing resource protection within Grand Staircase – Escalante National Monument administered lands.

Intensity:

The following discussion is organized around the Ten Significance Criteria described in 40 CFR 1508.27 and incorporated into resources and issues considered (includes supplemental authorities Appendix 1 H-1790-1) and supplemental Instruction Memorandum, Acts, regulations and Executive Orders.

The following have been considered in evaluating intensity for this proposal:

- 1. Impacts may be both beneficial and adverse.** The proposed action would impact resources as described in the attached EA. Authorizing groups of up to 395 people would increase opportunities for heritage, educational and recreational activities, which is a beneficial impact to recreational users and members of the LDS church that have a cultural affiliation to the area. The historical relevance of this area is recognized in the Monument Proclamation and Monument Management Plan. Measures to reduce the identified adverse impacts to cultural resources, recreation, WSAs and lands with wilderness characteristics were incorporated in the design of the action alternatives. None of the adverse environmental effects discussed in detail in the EA and associated appendices are considered significant, nor do the effects exceed those described in the Grand Staircase – Escalante National Monument MMP/FEIS.
- 2. The degree to which the selected alternative will affect public health or safety.** Risks to public health and safety would not increase or decrease based on this decision. There are inherent dangers in all outdoor activities that include but are not limited to: driving an automobile, hiking, and camping. This project does not increase any health and safety concerns beyond current conditions.
- 3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wilderness, wild and scenic rivers, or ecologically critical areas.** The historic and cultural resources of the area have been inventoried and potential impacts addressed in the design of the action alternatives. The following components of the Human Environment and Resource Issues are not affected because they are not present in the project area. Resources not present include: Areas of Critical Environmental Concern, BLM natural areas, environmental justice, farmlands, hydrological conditions, threatened, endangered, and candidate plant species; Threatened, Endangered or Candidate Animal Species, Wastes, Water Resources/Quality, Wild & Scenic Rivers, Vegetation, Excluding USFW Designated Species, and Wild Horses and Burros.

In addition, the following components of the Human Environment and Resource Issues, although present, would not be affected by this proposed action for the reasons listed in Appendix A of the EA: Air Quality, Biological Soil Crusts, Greenhouse Gas Emissions, Fish and Wildlife Excluding USFWS Designated Species, Floodplains, Fuels/Fire Management, Geology / Mineral Resources /Energy Production, Invasive Species /Noxious Weeds, Lands/Access, Livestock Grazing, Migratory Birds, Paleontology, Rangeland Health Standards, Socio-Economics, Soils, Wetlands/Riparian Zones, Woodland / Forestry, and Visual Resources.

Cultural resources, recreation, wilderness study areas, and non-WSA lands with wilderness characteristics were analyzed in detail in Chapter 4. None of these would be significantly impacted because the overall cumulative impact among the identified issues of cultural, recreation, wilderness study areas, and non-WSA lands with wilderness characteristics have been determined minimal. Inventory for cultural resources and consultation with the State Historic Preservation Officer (SHPO) have been completed. The SHPO concurs that there would be no adverse effect to historic properties. Devils Garden WSA is currently a high use destination location, the increase in visitation to this site would be considered minimal considering the current high visitation by the general public. Recreational impacts would pose minimal annual increases (1 to 3.6%) in recreational use in a passage zone where encounters with other visitors is expected. Implementation of the proposed action would not prevent the BLM from considering protection of non-WSA lands with wilderness character within the project area in future planning processes.

4. **The degree to which the effects on the quality of the human environment are likely to be highly controversial.** There is no scientific controversy over the nature of the impacts to cultural and recreation resources. Controversy does exist regarding impacts to non-WSA lands with wilderness characteristics. The EA concludes that impacts would occur from organized group camping on lands with wilderness characteristics. However, the BLM has included adaptive management strategies within the EA that will allow the BLM to monitor and mitigate impacts.
5. **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.** The project is not unique or unusual. The BLM has experience implementing similar actions (i.e., group heritage activities and reenactments) along historic trails in areas like Martins Cove in Wyoming. The environmental effects to the human environment are fully analyzed in the EA. There are no predicted effects on the human environment that are considered to be highly uncertain or involve unique or unknown risks. GSENM will apply adaptive management practices by monitoring and recording special event activities. Based on findings from event and site monitoring, BLM will make necessary changes to future permit stipulations to minimize potential risks.
6. **The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** The selected alternative was evaluated in the EA for potential future impacts related to increased interest and application numbers, as well as a cumulative impacts reasonable foreseeable action scenario that included other future actions. No significant impacts were identified as a result of these direct, indirect, or cumulative impacts. Although the analysis is programmatic in nature, the decision to

approve or deny BLM SRPs remains at the discretion of the authorized official on a permit-by-permit basis.

7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts – which include connected actions regardless of land ownership.** The actions considered in the selected alternative were considered by the interdisciplinary team within the context of past, present, and reasonably foreseeable future actions. Significant cumulative effects are not predicted. A complete analysis of the direct, indirect, and cumulative effects of the selected alternative and all other alternatives is described in Chapter 4 of the EA. BLM has identified two potential future actions along Hole-in-the-Rock road, the relocation of the Dry Fork Trailhead and installation of toilets at Dance Hall Rock. Both future actions are not proposed as a part of this EA, but are currently being considered based on the need to provide these amenities to protect natural resources and public health. These two reasonably foreseeable future actions will be addressed in separate environmental assessments.
8. **The degree to which the action may adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.** The project will not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National Register of Historic Places, nor will it cause loss or destruction of significant scientific, cultural, or historical resources. A cultural inventory has been completed for the proposed action, and consultation with SHPO has been completed in accordance with Section 106 of the NHPA and they have concurred with a “no adverse effect” on cultural resources. Refer to the Appendix F of the EA for the SHPO concurrence letter.
9. **The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973, or the degree to which the action may adversely affect: 1) a proposed to be listed endangered or threatened species or its habitat, or 2) a species on BLM’s sensitive species list.** No threatened or endangered plants or animals are known to occur in the area.
10. **Whether the action threatens a violation of a federal, state, local, or tribal law, regulation or policy imposed for the protection of the environment, where non-federal requirements are consistent with federal requirements.** The project does not violate any known federal, state, local or tribal law or requirement imposed for the protection of the environment. State, local, and tribal interests were given the opportunity to participate in the environmental analysis process. Furthermore, letters were sent to seven Native American tribes concerning consulting party status; there were two responses from tribes. The Hopi tribe has requested a copy of the Draft EA when it is available for public comment. The Navajo tribe stated “the project area will not impact Navajo traditional cultural resources.” The project is consistent with applicable land management plans, policies, and programs.

Authorized Officer

Date

**United States Department of the Interior
Bureau of Land Management
National Park Service**

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Hole-in-the-Rock Organized Group Programmatic Environmental Assessment (DOI-BLM-UT-0300-2010-0008-EA)

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Hole-in-the-Rock Organized Group Programmatic Environmental Assessment (DOI-BLM-UT-0300-2010-0008-EA)

1.0 PURPOSE & NEED

1.1 Introduction

This Environmental Assessment (EA) has been prepared to disclose and analyze the environmental consequences of authorizing organized group activities that exceed existing group size limits along the Hole-in-the-Rock (HITR) Road corridor. The HITR Road corridor is managed by the Bureau of Land Management (BLM) within the Grand Staircase-Escalante National Monument (GSENM) and the National Park Service (NPS) within Glen Canyon National Recreation Area (GLCA). The EA is a site-specific analysis of potential impacts that could result with the implementation of the proposed action or alternatives to the proposed action. The EA assists the GSENM and GLCA in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any “significant” impacts could result from the analyzed actions. “Significance” is defined by NEPA and is found in Title 40, Part 1508.27 of the Code of Federal Regulations (40 CFR 1508.27). An EA provides evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a statement of “Finding of No Significant Impact” (FONSI). If the decision makers determine that this project has “significant” impacts following the analysis in the EA, then an EIS would be prepared for the project. If not, a decision document may be signed to select an alternative, whether the proposed action or another alternative. The BLM and NPS would sign separate decision documents for actions on their respective land jurisdictions. For the BLM, a decision record (DR), including a FONSI statement, documents the reasons why implementation of the selected alternative would not result in “significant” environmental impacts (effects) beyond those already addressed in the *Grand Staircase – Escalante National Monument Management Plan (MMP) (2000)*. For the NPS, a FONSI would constitute the decision document for the selected alternative if no significant impacts are identified.

1.2 Background

The HITR Road, a State Scenic Backway, is located in Garfield and Kane Counties, Utah, on lands managed by BLM and NPS. The road is a gravel and dirt road accessed via Utah State Route 12 (an All-American Road) between the towns of Escalante and Boulder, Utah. From the HITR road northern intersection with Utah State Route 12, the first 52 miles of the road are within GSENM with the last 9 miles traverse GLCA lands.

Today, the HITR Road serves as a gateway to the Escalante Canyons Special Recreation Management Area, and connects the public to primitive and undeveloped areas that offer outstanding opportunities for exploration and non-motorized recreation. Recreation destinations along the HITR Road include: Devils Garden, Dinosaur Tracks, Harris Wash Trailhead, Dry Fork Trailhead, Batty Pass Caves, Egypt slot canyons, Twentyfive Mile wash, Coyote Gulch, Fiftymile Wash, and Fiftymile Mountain Trailhead. In addition, the road provides access to many undeveloped routes leading into the Escalante Canyons within GSENM and GLCA.

The HITR Road also closely follows the route of the 1879 Hole-in-the-Rock trek, an epic journey in which members of The Church of Jesus Christ of Latter-day Saints

(LDS), also known as Mormons, established a more direct route across the Colorado River to the southeastern corner of Utah in order to settle at Fort Bluff along the San Juan River. This journey is noted in the GSENM Proclamation, *“The monument has a long and dignified human history: it is a place where one can see how nature shapes human endeavors in the American West... Early Mormon pioneers left many historic objects....and built and traversed the renowned Hole-in-the-Rock Trail as part of their epic colonization efforts.”*

There are two sites on the National Register of Historic Places associated with the trek that are located along Hole-in-the-Rock Road. Dance Hall Rock is located 41 miles down the road from State Route 12 and is where pioneers held dances in its natural amphitheater to socialize and keep spirits high. The actual “Hole-in-the-Rock” is 61 miles down the road from State Route 12 where pioneers engineered a passage to the Colorado River down an almost 1000-foot escarpment.

Since that first expedition, local and regional Mormon pioneer heritage groups customarily traveled to Dance Hall Rock and the Hole-in-the-Rock site for education purposes. During the 1960s and 1970s, the BLM has documentation of groups holding social gatherings at Dance Hall Rock.

In 2001, GSENM issued a Special Recreation Permit (SRP) allowing Scenic Safaris, Inc. to conduct pioneer wagon trek reenactments down Hole-in-the-Rock Road for 5 years. Group size limits, identified in NEPA analysis in the Hole-in-the-Rock Wagon Trek Reenactment EA (UT-030-01-022), were set at 60 people, and the maximum number of pack animals limited to 25. The SRP holder conducted the event once after authorization.

In 2009, the historical novel *The Undaunted. The Miracle of the Hole-in-the-Rock Pioneers*, was published detailing the 1879-80 Mormon expedition across Southern Utah and the Hole-in-the-Rock region. The novel enabled Latter-day Saints to re-discover this chapter in their pioneer history and elicited a renewed interest in educating their members, particularly youth, about its meaning through re-creation of the trek.

During 2010, BLM authorized four SRPs to organized groups associated with the LDS Church to host heritage events at Dance Hall Rock. Group sizes during these events ranged from 40 to 250 people. Also in 2010, NPS issued three Special Use Permits (SUPs) to visit Hole-in-the-Rock site. These groups included an LDS youth conference group, a hiking organization, and a four-wheel-drive excursion group.

In 2010, construction of the Hole-in-the-Rock - Escalante Heritage Center was completed, and the facility formally opens to the public in May 2011. The interpretive facility focuses on sharing the stories associated with the Hole-in-the-Rock trek and Escalante history. Maps detailing the expedition route and historic sites are highlighted in the interpretive media on site.

Considering past demand both recently and from decades ago, the publishing of *The Undaunted*, the opening of the Hole-in-the-Rock-Escalante Heritage Center, and a general upswing in heritage tourism nationwide, GSENM and GLCA foresee a continuing desire for groups that exceed current group size limits to travel along the HITR Road and to visit its historic sites for the heritage, educational, and recreational values they provide.

1.3 Need for the Proposed Action

The need for the proposed action is for the GSENM and GLCA to efficiently respond to future permit requests for short-term organized group activities along the Hole-in-the-Rock Road corridor in accordance with BLM and NPS laws, policies, guidance and management plans.

BLM has the discretion to issue SRPs for organized groups participating in recreational activities on public lands. Regulations found at 43 CFR 2932 and BLM Manual 2930-1 outline the criteria used to determine when a SRP is required. The GSENM Monument Management Plan (MMP) prescribes group size limits of 25 in the GSENM Passage Zone along the HITS Road. However, the MMP goes on to state that “*permits for groups over 25 people will be considered in the Passage and Outback Zones, if the number of people and the activities proposed are consistent with the protection of Monument resources. Appropriate NEPA analysis will be prepared on areas where permits could be authorized. These permits will require that adequate sanitation and trash collection are provided, and that activities take place in areas where resources will not be damaged*”

NPS is required to issue SUPs for organized groups of any size. NPS Reference Manual 53 outlines the Special Park Uses permitting process, of which SUPs are included. Hole-in-the-Rock Road is within the Development Zone in GLCA. Existing GLCA NEPA documentation only analyzed groups up to 100 people in the Development Zone and 60 people in the Natural Zone.

1.4 Purpose(s) of the Proposed Action

The purpose of the action is to provide opportunities for organized group/heritage activities along the Hole-in-the-Rock corridor in Garfield and Kane Counties that may exceed existing management prescriptions for group size. These opportunities would also minimize impacts to cultural resources and protect visitor experience in connected primitive and undeveloped areas through use of existing disturbed areas.

1.5 Conformance with Land Use Plan(s)

These proposed special events fall under two distinct management plans directing permitted activities by GSENM and GLCA.

Grand Staircase – Escalante National Monument Management Plan (2000)

The Grand Staircase – Escalante National Monument Management Plan (MMP) designated four management zones to address appropriate uses within areas of the GSENM: Frontcountry, Passage, Outback, and Primitive. The Hole-in-the-Rock Road, Dance Hall Rock, Devils Garden and the proposed camping/staging areas are within GSENM’s designated Passage zone, which contains secondary travel routes used as throughways and recreation destinations.

The proposed action would conform to the following related MMP objectives:

(GROUP-02) - Group size will be limited to 25 people in the Passage and Outback Zones.

(GROUP-03) Permits for groups over 25 people will be considered in the Passage and Outback Zones, if the number of people and the activities proposed are consistent with the protection of Monument resources. Appropriate NEPA analysis will be prepared on areas where permits could be authorized. These permits will require that adequate sanitation and trash collection are provided, and that activities take place in areas where resources will not be damaged.

It has been determined that the Proposed Action and Alternatives would not conflict with other decisions throughout the MMP.

Glen Canyon National Recreation Area, General Management Plan (1979)

The Glen Canyon National Recreation Area General Management Plan (GMP) divides the recreation area into four management zones: Natural, Recreation and Resource Utilization, Development, and Cultural zones. The Hole-in-the-Rock Road falls within the Development management zone, which the GMP contemplated as an area for an administrative operations center. Some areas adjacent to the Hole-in-the-Rock Road are within the Natural zone. Examples of permitted uses within the Natural zone are such recreational pursuits as hiking, camping, picnicking, backpacking, and horseback riding, as well as grazing activities. Examples of permitted uses within the Development zone are the same types of activities, with more provision for motorized access and facilities in support of recreational pursuits and interpretive activities.

Though the GLCA GMP does not directly prescribe specific objectives related to permitted activities, the objectives of the GMP do direct the NPS “to interpret historical and archeological resources and the culture of aboriginal societies while centering interpretive themes around outdoor recreation”, while maintaining “a relatively primitive experience” in the Escalante district. The GMP also made a recommended wilderness designation precisely congruent to the Natural management zone.

1.6 Relationship to Statutes, Regulations, or Other Plans

The proposed action is consistent with federal environmental laws and regulations, Executive Orders, and Department of Interior and the GSENM and GLCA policies. It is in compliance with state laws and local and county ordinances and plans, including the following:

National Historic Preservation Act (1966)

Federal Lands Policy and Management Act (1976)

Title III, Sec. 302. [43USC 1732] (b) “the Secretary shall... regulate, through easement, permits, leases...the use, occupancy, and development of public lands...”

Federal Lands Recreation Enhancement Act (2004)

Section 803(f). “The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, and motorized recreational vehicle use.”

Glen Canyon National Recreation Area Enabling Legislation (1972)

“... Provide for the public outdoor recreation use and enjoyment of Lake Powell and lands adjacent thereto... and to preserve the scenic, scientific, and historic features contributing to the public enjoyment of the area...”

Proclamation for the Grand Staircase-Escalante National Monument (1996)

43 CFR 2932 (BLM) – Special Recreation Permits for Commercial Use, Competitive, Events, Organized Groups, and Recreational use in Special Areas.

36 CFR Part 1.6 (NPS) - Permits

BLM Handbook H-2930-1 – Recreation Permit Administration

NPS Director’s Order #53 – Special Park Uses

NPS Management Policies 2006 - Ethnographic Resources, Traditional Cultural Properties, Traditionally Associated People, Special Park Uses

Glen Canyon Superintendent’s Compendium (2010)

2.10(a) Camping: conditions and permits

- When camping 100 feet or more from Lake Powell's full pool level (3700 feet), and outside designated campgrounds, group size for hiking and/or camping shall not exceed 12 people and 3 vehicles (and may be further restricted by permit). Groups greater than 12 people shall split into groups of 12 or fewer, and camp at least 1/2 mile apart.
- Camping within the Escalante Sub District requires a permit, either self registration at trailheads or through Grand Staircase – Escalante National Monument Visitor Centers.

2.14(b) Sanitation: conditions concerning disposal, containerization and carrying out of human waste

All persons camping within 1/4 mile of the shore of Lake Powell, the San Juan River, Dirty Devil River or the Colorado River, except at locations designated by the Superintendent as having constructed toilets, shall have a means to contain solid human waste such as a portable toilet, a specifically engineered bag waste containment system, a marine toilet on a vessel or a self contained toilet in a recreation vehicle. A method of containing solid human waste is required for these locations if campsites are more than 200 yards from any constructed toilet facility.

Garfield County General Plan (1998, amended with Resource Plan 2007) –

Although organized group use along Hole-in-the-Rock Road corridor is not specifically mentioned in the Garfield County General Plan, it does mention Hole-in-the-Rock as an important historic resource. It also states:

4.2.1D(4) Interpretive opportunities for the Hole-in-the-Rock Road, Dance Hall Rock, and other associated features need to be expanded.

Beyond those items noted, the plan review revealed that the Proposed Action and alternatives would not be in conflict.

Kane County Plan General Management Plan (1998, updated 2010)

Although organized group use along Hole-in-the-Rock Road corridor is not specifically mentioned in the Kane County General Plan, a review of the document reveals that the Proposed Action and alternatives would not conflict with it.

1.7 Identification of Issues

On September 9th, GSENM and GLCA employees met to discuss the development of an EA for the proposed action. In this meeting, staff identified issues to be addressed in the EA. An October 22, 2010 a meeting was held among GSENM and GLCA management and staff specialists to discuss management plan prescriptions and identify management issues associated with the project. During this meeting, land use plan consistencies and differences were outlined to provide direction in developing project alternatives. Further interdisciplinary scoping was conducted among GSENM and GLCA interdisciplinary teams prior to completion of the EA.

A scoping letter was mailed on November 18, 2010 to the public soliciting comments for this EA. The scoping period ended on December 12, 2010. The proposed action was posted on the Utah BLM Environmental Notification Bulletin Board (ENBB) website for public review on November 17, 2010. Eleven comment letters were received.

Scoping issues identified during internal and external scoping:

1.7.1 Cultural

- How will BLM/NPS protect historical sites, cultural sites, monument and recreation area resources with the implementation of the action?
- How will ethnographic resources (such as sites and traditional uses important to LDS or Native American tribes) be affected by the project?

1.7.2 Recreation

- How will group size affect other recreational users?
- How will permit monitoring document impacts from the activities?
- How will the GSENM and GLCA address continued interest in these large group activities along the Hole-in-the-Rock Road?
- What user conflicts will occur from permitting large groups?

1.7.3 Wilderness Study Areas

- How will Devils Garden be affected by day use within the proposed action?

1.7.4 Non-WSA Lands with Wilderness Characteristics

- How will non-WSA lands with wilderness character be affected by the action?

1.8 Issues Considered but Eliminated from Further Analysis

Some issues brought up in internal and external scoping were considered, but eliminated from analysis based upon design features incorporated within the action alternatives. These included the potential for the spread of invasive and noxious weeds, potential impacts to livestock grazing operations, impacts to potential threatened and endangered species habitat, and trampling of biological soil crusts beyond the disturbed areas analyzed. See the Interdisciplinary Team Checklist (Appendix A) for the full rationale for eliminating these resources from analysis.

1.9 Summary

This chapter has presented the purpose and need of the proposed action and identified the various elements of the human environment that could be affected by implementing of the proposed action. The potential environmental impacts or consequences resulting from the implementation of the Proposed Action and alternatives are then analyzed in Chapter 4 for each of the identified issues.

2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION

2.1 Introduction

GSENM and GLCA propose to develop criteria for issuing BLM Special Recreation Permits (SRP) and NPS Special Use Permits (SUP) for organized group activities along the Hole-in-the-Rock Road corridor. The action would establish groups group size limits, vehicle number limits, sanitation measures, length of stay limits, seasons of use restrictions, and predetermined camp site locations. The permitting criteria would be implemented for all future applications for organized group activities along Hole-in-the-Rock Road.

The range of alternatives were developed based upon potential applicant group sizes and the capacity of available disturbed camp site locations to accommodate groups, including vehicles and vehicle parking, camping areas, community areas, and toilets. Sanitation requirements and length of stay were also incorporated in the action alternatives to address identified scoping issues.

2.2 Alternative A – No Action

The No Action alternative would continue the implementation of GSENM Monument Management Plan (MMP) and GLCA General Management Plan (GMP)/Superintendent’s Compendium prescriptions. No predetermined camping locations would be established, group size would be limited to 25 people on BLM land and 100 on NPS land (with camping groups limited to 12 people in GLCA), and number of vehicles would be limited to 25 on GLCA and no limit on GSENM. No set number for toilets would be established, and lengths of stay would be determined by existing general user limits. Standard GSENM SRP and GLCA SUP stipulations (Appendices C&D) would apply. Existing prescriptions include:

Table 1 Alternative A – No Action		
Prescriptions	GSENM	GLCA
Management Zone	Passage Zone	Development Zone
Maximum Group Size	25	≤ 100
Maximum Number of Vehicles	Undetermined	25
Sanitation requirements	Applicant provides toilets	Applicant provides toilets
Fees	\$5 per person/per day or \$100 per group, whichever is greater	\$100 application fee + monitoring fees if necessary
Camping locations	Undetermined	Limited by group size of 12 people per group, 3 vehicles, not within 1/2 mi. of trailhead
Maximum Length of Stay	14 Day Limit	14 Day Limit

2.3 Alternative B – Proposed Action

The Proposed Action alternative was developed based on several factors. Day use sites identified in this EA are the primary reason for visitation, therefore, day use and camp location capacities were calculated to provide BLM and NPS carrying capacity formulas for each location. Since Dance Hall Rock is the easiest to access and most requested historic site for groups, the identified group capacity for this site defined the overall group limit for this alternative. This would allow camping groups of the maximum size the opportunity to enjoy day use sites at the same time.

The Proposed Action alternative would authorize 11 predetermined camp locations and establish group size limits for each camp location as shown in Table 4 below, with the highest established group size limited to 145 based on the Dance Hall Rock site capacity. Seasons of use for specific locations, a 29-vehicle maximum, and maximum length of stay of three days/two nights for large groups and twelve days for reenactment events would also apply. Permitted camp locations would be based upon group size. GSENM and GLCA would set day use capacity at Dance Hall Rock and Hole-in-the-Rock at 145 people and 29 vehicles. Due to limited parking at Dance Hall Rock, permit holders would be required to park up to 20 vehicles along the shoulder of the Hole-in-the-Rock Road. All permits would follow existing standard GSENM and GLCA stipulations for SRP's and SUP's (Appendices C&D). See Map 1 for day use and camp locations.

Table 2		
Alternative B – Proposed Action		
Prescriptions	GSENM	GLCA*
Management Zone	Passage Zone	Development Zone
Maximum Group Size	145	145
Maximum Number of Vehicles	29	29
Sanitation requirements	6-8 toilets required	6-8 toilets required
Fees	\$5 per person/per day or \$100 per group, whichever is greater	\$100 application fee + monitoring fees if necessary
Camping locations	Tenmile Wash (2 sites), Twentymile Wash (2 sites), Countyline Camp (2 sites),	Soda Cabin

	Big Hollow Windmill, Fortymile Ridge (2 sites), Sooner Wash	
Maximum Length of Stay	3 days/2 nights (Groups) 12 days (Equestrian and reenactments)	3 days/2 nights (Groups) 12 days (Equestrian and reenactments)
Number of Concurrent Permits	No more than one BLM permit would be issued at a time to reduce user conflicts and resource damages	No more than one NPS permit would be issued at a time to reduce user conflicts and resource damages
		*Compendium change required

*GLCA Superintendent's Compendium change required. The NPS decision document would direct this action.

2.4 Alternative C – Highest Use

The Maximum Use alternative would establish 11 predetermined camp locations, authorize group size limits for each camp location as shown in Table 4, seasons of use restrictions for specific locations, a group size of 395 people with 79 vehicles maximum, and a six-day, five-night length of stay for large groups and fourteen days for reenactment events. Predetermined camping locations would be assigned based on applicant group size. If the proposed group size exceeds the maximum camp location capacity, the group could be assigned multiple camping locations. All permits would follow existing standard GSENM and GLCA stipulations for SRP's and SUP's (Appendices C&D).

A group size of 395 people was analyzed to address interest in larger group use. Previously, BLM has received applications for heritage events with groups as large as 250 people. BLM identified one camp location (Twentymile Wash North) that could accommodate 395 people, based upon disturbed area capacity calculations. The possibility exists that GSENM and GLCA may receive another application of this size (250 people) or greater so GSENM and GLCA used the largest camp location capacity identified as the highest use alternative group limit. See Map 1 for day use and camp locations.

Table 3 Alternative C – Highest Use		
Prescriptions	GSENM	GLCA*
Management Zone	Passage Zone	Development Zone
Maximum Group Size	395	395
Maximum Number of Vehicles	79	79
Sanitation requirements	15 toilets required	15 toilets required
Fees	\$5 per person/per day or \$100 per group, whichever is greater	\$100 application fee + monitoring fees if necessary
Camping locations	Tenmile wash (2 sites), Twentymile wash (2 sites), Countyline Camp (2 sites), Big Hollow Windmill, Fortymile Ridge camp (2 sites), Sooner Wash Camp	Soda Cabin
Maximum Length of Stay	6 days/ 5 nights (Groups) 14 days (Equestrian and reenactments)	6 days/5 nights (Groups) 14 days (Equestrian and reenactments)
Number of Concurrent Permits	No more than one BLM permit will be issued at a time to reduce user conflicts and resource damages	No more than one NPS permit will be issued at a time to reduce user conflicts and resource damages
		*Compendium change required

*GLCA Superintendent's Compendium change required. The NPS decision document would direct this action.

2.5 Actions Common to All Action Alternatives

Individual Site Management

Table 4 Camp Locations and Capacities					
Camp Locations	Existing Disturbance (acres)	Capacity (.013 acres/person)	# of Vehicles / 5 people per vehicle	Uses*	Permitted Use Limited to the Following Dates
Tenmile Wash Corral #1	1.47	114	23	ER	Apr. 1 to Jun. 30; Sept. 15 to Oct 30
Tenmile Wash #2	0.41	32	6	ER	Apr. 1 to Jun. 30; Sept. 15 to Oct 30
Twentymile Wash - South	1.09	84	17	All	Oct. 1 to June 15
Twentymile Wash - North	5.13	395	79	All	Oct. 1 to June 15
Countyline	0.69	53	11	All	None
Countyline East	0.25	19	4	ER	None
Big Hollow Windmill Admin Rd	1.61	124	25	All	None
Fortymile Ridge	3.41	262	52	All	None
Fortymile Ridge #2	.58	45	9	All	Jun. 15 to Oct. 1
Sooner Wash	0.62	48	10	All	None
Soda Cabin (NPS)	0.68	52	10	ER	Oct. 1 to May 31

Table 4 Cont. Day Use Locations and Capacities					
Day Use	Existing Disturbance (acres)	People Capacity (.003 acres/person)	# of Vehicles / 5 people per vehicle	Uses*	Permitted Use Limited to the Following Dates
Devils Garden (parking area)	0.25	100†	20†	All	None
Dance Hall Rock (Day Use)	0.44	145 ‡	29 ‡	All	None
Hole-in-the-Rock (parking area)(NPS)	0.74	205	41	All	None

*All = All user groups

*ER = Equestrian and Reenactments. Pre- and post-inspection required. Mandatory coordination with BLM and grazing permit holder required.

† Calculation based on actual parking area accommodations available for public use and organized groups.

‡ Day use calculation based on site capacity, not parking capacity.

Cultural

Cultural Monitoring – Cultural sites, including archeological and historical sites, and especially those associated with the Hole-in-the-Rock expedition of 1879-80, will be monitored on an annual basis and as determined necessary. Only one site within the action alternatives has an archeological site within the use area. All other sites have archeological sites in the surrounding areas. At this time it is unnecessary to modify the cultural monitoring program for the proposed uses.

Recreation

Education Outreach – GSENM and GLCA will provide educational outreach to permitted user groups emphasizing Leave No Trace and Tread Lightly principles. Educators/interpreters would highlight the cultural and historical significance to the area and communicate the need to protect and preserve artifacts found on public lands. These outreach opportunities may be provided in one of the GSENM or GLCA visitor centers or in the field.

Camp Locations – Eleven camping areas are identified in the action alternatives. Currently, GSENM and GLCA have no designated primitive camp sites along the Hole-in-the-Rock Road. All camp locations are previously disturbed areas that see regular use from grazing operations, county maintenance operations, general public use, as well as GSENM and GLCA administrative operations. Identified camp locations would provide multiple camp options for GSENM and GLCA to adaptively manage a rotation of permitted locations in response to resource and permit monitoring.

Camping areas are classified into two types: (1) camp areas available to all user groups and (2) those that would only be available to equestrian and reenactment groups. Camp locations adjacent to grazing facilities would be limited to equestrian and reenactment groups to allow for use of corrals for livestock. Grazing permittees responsible for maintaining the facilities would be contacted prior to issuing permits to coordinate the availability of range facilities. These equestrian camp locations were identified based on existing on-site equestrian facilities capable of accommodating permit applicants using horses. During a scoping meeting with grazing permittees, potential issues were identified regarding permitted use. The issues identified were related to the permittees' concern that permitted large organized groups could damage range facilities, which includes corrals, water troughs, water wells, and line sheds. In the event that damage occurs, the ability to receive timely compensation for necessary repairs could directly affect their ability to use the facilities during the permitted grazing season.

Devils Garden Day Use Capacity – Total group size of 65 people and 13 vehicles maximum would be allowed to visit Devils Garden for a maximum time of one and one half hours at one time. Groups would not be permitted to assemble for extended stays to minimize conflicts with other users visiting the area. Though the parking area at Devils Garden has a total capacity of 20 vehicles, BLM will limit the number of vehicles for SRP holders to 13 maximum in order to allow for general public use to occur concurrently with permitted use.

Camp Location Capacity Calculations - The calculations to determine the camp location capacity were developed by consulting with BLM/NPS recreation specialists, landscape architects, and engineers in other offices who host similar events. GSENM/NPS estimate that 0.013 acres per person is required to accommodate overnight use and 0.003 acres per person is required to accommodate days use. These calculations are included in Appendix B.

Camp Area Delineation – Camp areas would be delineated prior to each permitted use period. GSENM and GLCA will mark the boundary of the camp area using survey stakes with flagging. These markers will identify the use area for vehicle parking, tents, common areas, and toilets.

Noxious and Invasive Species

Campsites, day use sites, and the HITR Road will be monitored (ocular surveys) on a yearly basis for state listed noxious weeds and suspected new invasive plant species. BLM and NPS participate in the Early Detection and Rapid Response system. The goal of this system is to minimize the establishment and spread of new invasive species through a coordinated framework. Effective control methods for fast, early response include mechanical and/or chemical treatments. Following treatments, sites will be monitored regularly to prevent invasive non-native plants from establishing on these high use sites.

Adaptive Management and Monitoring

Departmental Manual 516, which applies to both the BLM and the NPS, has adopted a policy of adaptive management and defines it as a “system of management practices

based on clearly identified outcomes, monitoring to determine if management actions are meeting outcomes, and, if not, facilitating management changes that will best ensure the outcomes are met or to re-evaluate outcomes.”

Adaptive management is integral to management of GSENM. The Monument Management Plan defines adaptive management as “...a formal process for continually improving management policies and practices by learning from the outcomes of operational programs and new scientific information. Under adaptive management, plans and activities are treated as working hypotheses rather than final solutions to complex problems.” Adaptive management is a continual, iterative process that consists minimally of four phases: planning, implementation, monitoring and evaluation.

GSENM Adaptive Management Process

The MMP defines the indicators to be used in determining whether recreation allocations are needed (ALLO-1):

1. resource damage (e.g., proliferation of campsites, human waste problems, social trailing or vandalism to historical, archaeological, paleontological sites, or destruction of biological soil crusts);
2. conflicts with threatened and endangered plant or animal species; and/or
3. the numbers of social encounters become unacceptable.”

Though the existing GLCA GMP did not include language related to adaptive management, the NPS prescribes a similar framework for the application of adaptive management and monitoring.

Recreation – GSENM will utilize the GSENM Backcountry Monitoring database system, forms, and pictures to track and identify impacts on the camp locations and the surrounding areas. The forms, such as Patrol and SRP Field Monitoring reports, allow staff to collect data on road and route conditions, resource conditions (erosion or secondary trails, soil compaction, fire rings, OHV use, other human use, dogs, livestock presence and/or impact, opportunity for solitude), identify work needed or completed to a site, and review Leave No Trace practices. Forms allow reporting staff to write narratives and document SRP compliance as outlined in permit stipulations. The GSENM Backcountry Monitoring Database System was developed to track resource use and impacts for roads, routes, backcountry use, rangeland health, project management, permits, etc. GSENM and GLCA would perform on-site, pre- and post-event, as well as pre- and post-season monitoring for permitted activities along HITR Road. During permitted use, GSENM and GLCA staff would conduct on-site compliance monitoring with permitted groups. Each use area, day use and camping, would be monitored individually although the data would be compiled collectively to allow GSENM and GLCA to make necessary adjustments to the management decisions. Based on monitoring findings, GSENM would use adaptive management to make necessary adjustments to protect resource concerns. Changes to GSENM and GLCA management of permitted activities along the HITR Road may include: modifying pre-, post-, and on-site monitoring schedules; identifying additional stipulations to protect resources and reduce user

conflicts; reducing or increasing group numbers; resting or rotating camp locations and/or day-use sites to disperse impacts and allow for natural recovery; and modifying seasonal use limitations to reduce user conflicts. For example, camp locations that receive heavier impacts than expected may be rested and camping would be directed to another predetermined camp location. Adjustments to day use areas would be made based on information and data collected during special events and general public annual use.

Non-WSA Lands with Wilderness Characteristics – Backcountry Monitoring Database system (which includes form and photographic documentation) would provide the necessary information and data to make necessary changes if impacts to naturalness are identified. In the event the BLM or NPS determines that permits for heritage groups is contributing to a loss of naturalness that could prevent the agencies from considering protection of these areas in the future, the agencies would rest or preclude use of camp sites to allow restoration.

2.6 Alternatives Considered, but Eliminated from Further Analysis

Several other alternatives were considered in the development of the proposed action and alternatives.

Alternative Considering a Group Size Limit Higher than 395 People - The purpose and need of this project is to allow the BLM and NPS to respond to an increasing demand for permitted activities along the HITR Road. The action alternatives propose establishing predetermined camping and day-use areas only on pre-disturbed lands in order to conform to BLM and NPS laws, proclamations, policies, and regulations regarding the protection of natural and cultural resources. Agency camping and day-use area capacity calculations have determined that existing pre-disturbed lands are not capable of accommodating more than 395 people, and therefore an alternative establishing higher group size limits was eliminated from further analysis.

Cat Well Camping Location – Cat Well was originally considered as a camping location. This location has the soil type needed to support *Lesquerella tumulosa* (Kodachrome Bladder Pod) a federally listed T&E plant species. This site was eliminated from further consideration to prevent any undue degradation to this plant's habitat.

Fortymile Spring Camping Location – Fortymile Spring was originally considered as a camp area because of the site's historical significance to the Hole-in-the-Rock expedition. The site lies within the Primitive Zone established in GSENM MMP which does not allow for group sizes to exceed 12 people. Therefore, a Monument Management Plan amendment would be required to establish this site as a predetermined camping area. Potential user conflicts with grazing permit holders and resource conflicts with wildlife habitat at this site were also identified during internal and external scoping efforts, which led to eliminating this site from further consideration.

Eliminating Non-WSA Lands with Wilderness Characteristics Camp Locations – Camp locations in non-WSA lands with wilderness characteristics were considered for elimination in the EA. Six of eleven camp locations are within non-WSA lands with

wilderness characteristics. Removal of all sites in non-WSA lands with wilderness characteristics would eliminate all large camp locations in close proximity to Dance Hall Rock. This would require large groups to camp at Twentymile Wash and therefore create the need to travel 20 miles to Dance Hall Rock for special events. In addition, all eleven camp locations are spaced six to ten miles apart. Equestrian and reenactment groups would not have camp locations within one days' walking distance from one site to the next. Therefore, the removal of non-WSA lands with wilderness characteristics camp locations would not fully address the purpose and need of the proposed action or alternatives. Furthermore, camp location impacts to non-WSA lands with wilderness characteristics would be best addressed through the adaptive management criteria.

2.7 NPS Environmentally Preferred Alternative

The GLCA environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (Sec. 101 (b)).

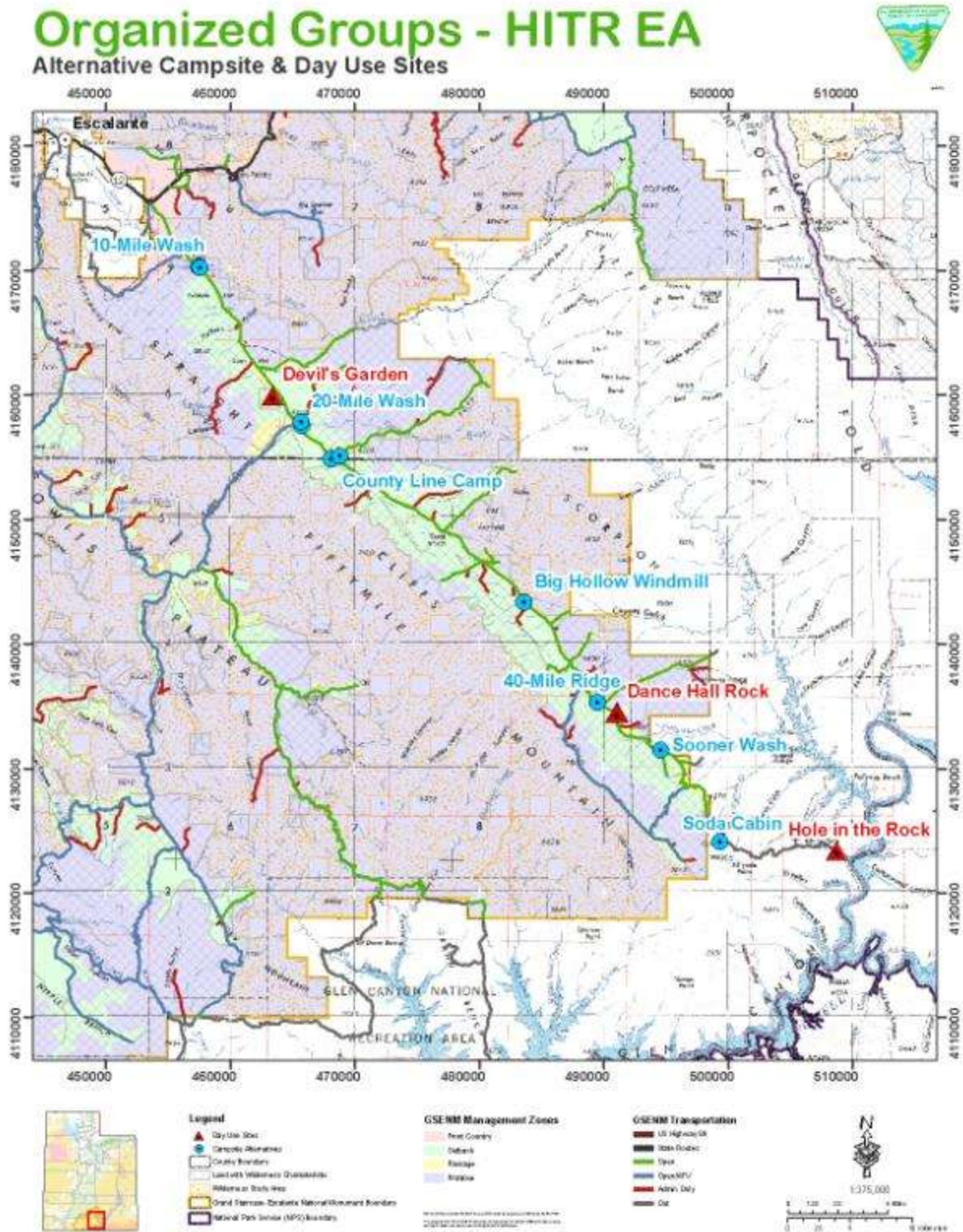
This includes alternatives that:

1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.
2. ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings.
3. attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
4. preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.
5. achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The NPS environmentally preferred alternative has been identified to be the Proposed Action, which would best balance the opportunities for resource use and enjoyment, while protecting the environment from further degradation. This alternative would address elements 1, 2, and 3 of Section 101 of NEPA by identifying and providing for the opportunities of groups to enjoy the cultural and aesthetic resources of the Hole-in-the-Rock corridor. The stipulations included would allow a safe and healthful experience for both permitted users and other visitors. The Proposed Action would also respond to elements 4 and 5 by extending more opportunities for the public to enjoy group activities along the HITR Road. Lastly, a diverse and preserved environment would be best addressed by the Proposed Action through the incorporation of the many design features intended to reduce impacts to natural resources.

Map of day use and camping locations

Map 1



3.0 AFFECTED ENVIRONMENT

3.1 Introduction

This chapter presents the potentially affected existing environment (i.e., the physical, biological, social, and economic values and resources) of the impact area as identified in the Interdisciplinary Team Checklist found in Appendix A and presented in Chapter 1 of this assessment. This chapter provides the baseline for comparison of impacts/consequences described in Chapter 4.

3.2 General Setting

The organized groups and re-enactment route would travel from the beginning of the Hole-in-the-Rock Road along State Route 12 in Garfield County, to the end of Hole-in-the-Rock Road in Kane County on the cliffs above Lake Powell. It passes through pinyon-juniper woodlands, cool desert shrub, sand desert shrub, and salt desert shrub plant communities. To the west of the route is the easternmost slope of Fiftymile Mountain running northwest to southeast, and to the east are the canyons of the Escalante, deep canyons cut through sandstone by the Escalante River. The vistas are wide, clear and unencumbered by built structures.

3.3 Resources/Issues Brought Forward for Analysis

3.3.1 Cultural Resources

Archaeological Resources

The area surrounding the Hole-in-the-Rock Road has an important and complex set of cultural resource sites. Human occupation dates back at least 13,000 years, and sites from the Archaic Period (BC 11,000 to 0 AD), the Formative Period (AD 1 to AD 1250), and from the Late Prehistoric (AD 1250 to the late 1800s) are all well represented. Prehistoric site types along the project route include camps, resource procurement locations, rock art, lithic scatters, rock shelters and overhangs, isolated artifacts, and middens. Sites from the Archaic and Late Prehistoric periods tend to be camp and resource procurement locations. Formative Period sites (Anasazi and Fremont cultures) include camps and resource procurement locations, and can also include residential pit structures (pit houses), surface structures, surface and subsurface storage structures, and granaries, although these are not likely along the project route. Prehistoric site densities can vary from only a few sites per square mile to 80 or more sites per square mile, depending on such factors as location, exposure, and proximity to resources. Several of the proposed camp locations are in areas of high prehistoric site density.

Historic sites include “cowboy glyphs” (historic signatures and cattle brands carved or scribed on rock faces) and sites such as corrals, line shacks, and historic spring improvements. Also included would be any site related to the historic pioneer Hole-in-the-Rock trek. Historic site densities are generally low, with these sites scattered few and far between.

Cultural resource inventories were conducted in all proposed camp locations and on surrounding public lands that would likely be used as a part of any permitted activities. Cultural resource inventories covered not only the proposed camp locations themselves, but also the surrounding countryside that may see casual use by the campers at these

various locations. A total of 29 historic properties were found, 27 of which were previously undocumented. Twenty five of these sites are considered eligible to the National Register. The inventoried sites are prehistoric and historic camp locations and historic signatures. No Anasazi or Fremont structural or residential sites were found, and only one possibly prehistoric rock art feature was noted, as a minor component of a larger site. Almost all the prehistoric sites appear to have been oriented around seasonal grass seed procurement and processing, with minor amounts of evidence of lithic material procurement.

Three of the 29 inventoried sites are found at one proposed camp area location. One site is an extensive prehistoric site including a rock shelter, as well as a larger open component. Most of this site is found under more than a meter of overlying sediments and is exposed only in the access road and deep erosional features. The second site is a series of “moqui steps,” or pecked hand-and-toe holds carved into near-vertical rock faces, located on a series of bedrock knobs and cliffs. The third site is a previously recorded historic corral and a line cabin; however, the corral is in very poor condition and the cabin was burned several years ago. The BLM, in consultation with the Utah SHPO, has determined that this third site is not eligible to the National Register of Historic Places.

All other inventoried sites are found in the hills and canyons surrounding the actual camp area locations that would be less intensively used as a part of the permitted activities. These sites include numerous historic signatures. In most cases the historic signatures were recorded as isolated finds (not recorded as historic sites), unless they were found within a complex of other archaeological or historic sites - in which case they were recorded as a feature of that larger site.

The BLM has determined, in consultation with Utah SHPO, that none of inventoried sites are eligible for listing on the National Register of Historic Places and that implementation of the action alternatives would have “No Adverse Effect” on any of the inventoried prehistoric or historic properties. Cultural resources inventory report U-11-BL-0061-b, outlining the rationale for this determination has been submitted to the Utah State Historic Preservation Office. The Utah SHPO concurred with the BLM determination of No Adverse Effect in a letter of May 3rd, 2011 (Appendix F).

Ethnographic Resources

Ethnographic resources are defined by NPS *Management Policies* (2006:70) as any natural or cultural resource, landscape, or natural feature that is linked by a cultural community to on-going traditional practices of that community. These “traditionally associated peoples” (2006:70) precede a park unit’s establishment and places within park lands are closely linked to that groups sense of purpose or existence. Cultural groups associated with the Hole-in-the Rock Trail and places along that corridor include members of The Church of Jesus Christ of Latter-day Saints, and potentially American Indian Tribes.

Consultation with American Indian Tribes

The NPS/BLM consulted with various tribal communities for information on areas of contemporary cultural importance that may be affected by organized group use. A formal letter initiating consultation and requesting information was sent to the following

tribes, councils, or bands: Hopi Tribe, Kaibab Paiute Tribe, Navajo Nation; Paiute Indian Tribe of Utah; Pueblo of Zuni; San Juan Southern Paiute; Ute Mountain Ute; and White Mesa Ute.

To date, only the Navajo and Hopi have responded. The Navajo have indicated that they have no concerns regarding this proposal. The Hopi have responded with potential concerns, should prehistoric sites be impacted by this proposal. They have requested a chance to review the completed cultural resources inventory report. This report, which received SHPO concurrence regarding site eligibility and the finding of “No Adverse Effect,” will be forwarded to the Hopi Tribe and any other Tribes that request an opportunity for review. In the event that significant ethnographic resources are identified, potential mitigating measures would be designed to lessen or eliminate negative impacts to those resources. Mitigating measures would be designed and implemented in full consultation with the affected tribes.

Consultation with the Community of Latter-day Saints

Most of the organized groups who requested Hole-in-the-Rock BLM SRPs and NPS SUPs are members of the LDS Church, also referred to as Latter-day Saints or Mormons. They were given permits to re-create the 1879-80 Hole-in-the-Rock Expedition. The NPS/BLM consulted with the Hole-in-the-Rock Foundation (the Hole-in-the-Rock/San Juan Mission descendants’ group); the History Department of the LDS Church in Salt Lake City, Utah; and with representatives of stakes and wards who have organized or are planning to organize reenactments of the Hole-in-the-Rock trek.

In the 1870s, members of the LDS Church engaged in a vigorous colonization effort that extended south and east of the Colorado River. In 1879, members of the San Juan Mission of approximately 250 people, accompanied by 83 wagons and livestock, assembled at Fortymile Spring to pioneer a new and shorter route to Bluff City, Utah. The new route would cross the Colorado River near its confluence with the Escalante River, rather than the more circuitous route crossings at Lees Ferry, Arizona or Moab, Utah. Upon reaching the rim of Glen Canyon, the party found their way blocked by the 1000-foot gorge overlooking the Colorado River. A natural fault in the rim provided the only possible route to the valley floor and across the river. The Mormon pioneers spent a total of almost two winter months drilling, blasting, and constructing a road from the rim to the river. The completed passage dropped over three-quarters of a mile and has since become known as Hole-In-The-Rock. The entire 180-mile route of their passage through southeastern Utah from Escalante to Bluff is known as the Hole-in-the-Rock Trail.

To contemporary members of Latter-day Saints, Hole-in-the-Rock has become one of the defining moments in their communal history. The engineered wagon passage through the Hole is now emblematic of the entire Expedition and of its significance to extant Latter-day Saints. They compare it to Martin’s Cove in Wyoming under BLM jurisdiction.¹ The achievement reflects the belief system and shared cultural attributes that propelled Mormon pioneers to accomplish the feat, as well as the collective history

¹ Martin’s Cove is a historic site in Wyoming located on the Mormon Trail. The Cove was listed on the National Register in 1977. The snow halted the Martin Handcart Company at the cove en route to Salt Lake City. While the number who died at the Cove is unknown, 145 of the party did die before reaching Salt Lake City. While the land is under BLM jurisdiction, the site is managed and maintained by the LDS Church under a lease agreement (http://en.wikipedia.org/wiki/Martin%27s_Cove).

that brought them to Utah. Re-creating the experience through an organized group process provides the opportunity to renew their shared history, traditions, and beliefs.

Latter-day Saints identified as ethnographic resources the entire Hole-in-the-Rock corridor from Escalante to Bluff, Utah, inclusive of Dance Hall Rock and Fortymile Spring. Inscriptions at Dance Hall Rock were extensively documented in 2000, but the inscriptions at Hole-in-the-Rock have received only initial documentation (there are hundreds of inscriptions at Hole-in-the-Rock and a thorough documentation was beyond the scope of this current site recording effort). The ethnographic value of the inscriptions is that they are tangible evidence of revered Mormon pioneers, whose contemporary descendents see and are inspired by the collective achievement that the inscriptions represent. Other locations or ethnographic resources identified along the corridor in Garfield and Kane counties include the campsites of the pioneers at Tenmile Spring, Twentymile, Coyote Holes, Cottonwood Gulch, and Fiftymile Spring. Some of the traditions that Mormons wish to engage in, particularly at Dance Hall Rock and Fortymile Spring, include fireside camp meetings, devotion, and the opportunity to read and re-enact pioneer accounts of that experience, as well as to dance at Dance Hall Rock - just as the pioneers did in 1879.

The entire Hole-in-the-Rock Trail, on both sides of the Colorado River, as well as the associated historic Expedition places, may be evaluated as eligible to the National Register of Historic Places as a “traditional cultural property (TCP).” A TCP is eligible to the National Register because of its association with the cultural practices or beliefs of a living community that are (1) rooted in that community’s history; and (2) important in maintaining the cultural identity of the community (*NPS Management Policies* 2006:70). Such a nomination is undertaken only with the agreement of the associated group.²

3.3.2 Recreation

The Utah Department of Transportation identifies that the Annual Average Daily Traffic along State Route 12 between Escalante and Boulder, Utah is 505 cars (Utah Department of Transportation). The BLM estimates an average of 43,278 people annually travel down Hole-in-the-Rock Road. Of these 43,278 visitors, approximately 3,544 people, or 8%, reach the GSENM and GLCA boundary located 52 miles from State Route 12. In 2010, BLM authorized four SRP’s to organized groups for education, camping, and reenacting historical events at Dance Hall Rock. A total of 450 people participated in these four permitted events, which equals 1% of the total annual use on the road. During 2010, NPS issued three SUPs to visit Hole-in-the-Rock site. This permitted use represents 12.5% of the total visitation to the Hole-in-the-Rock site. These groups included an LDS youth conference group, a hiking organization, and a four-wheel-drive excursion group. General use periods for general public along HITR Road occur during the spring and fall seasons to recreation destinations identified below. Past visitation of heritage groups has occurred during the months of June and July when temperature can exceed 100 degrees.

² *Guidelines for Evaluating and Documentation Traditional Cultural Properties*, National Register Bulletin 38, National Park Service, 1994

Hole-in-the-Rock Road is 61 miles in length and has three day-use sites: Devils Garden, Dance Hall Rock and the Hole-in-the-Rock site. Devils Garden is the only developed site and includes four picnic tables, one toilet and a developed parking area. Dance Hall Rock has an interpretive panel, developed parking area and provides for a semi-primitive recreation experience. The Hole-in-the-Rock site has an interpretive panel and historical plaque, no developed parking, and provides a semi-primitive recreational experience. To date, GSENM and GLCA have not developed camp sites along the Hole-in-the-Rock Road or in the immediate area.

The Hole-in-the-Rock corridor is an access road to many well-known backcountry destinations, including: Devils Garden, Batty Pass Caves, Egypt slot canyons, Dry Fork slot canyons, Coyote Gulch, Dance Hall Rock and the Hole-in-the-Rock historic site. Annual use along Hole-in-the-Rock Road includes the recreating public, county road maintenance, permitted ranchers, and GSENM and GLCA administrative uses. The road lies within the Passage Zone and is a gateway to the Escalante Canyons SRMA, connecting the public to primitive and undeveloped areas that offer outstanding opportunities for exploration and non-motorized recreation.

3.3.3 Wilderness Study Areas

One day use site is located in the Devils Garden Outstanding Natural Area (ONA). The area was designated as an Outstanding Natural Area on December 23, 1970 to preserve the “unique scenic values and natural wonders of the area.” The ONA is managed in accordance with the Interim Management Policy for Lands under Wilderness Review (IMP). The area is comprised of 640 acres, although Devils Garden itself is an area of five to ten acres of unique erosion sculptures carved from Entrada Sandstone. The area is a day use destination for many users traveling along Hole-in-the-Rock Road. Devils Garden is 18 miles from State Highway 12 and provides interpretive panels, a toilet, a parking area and an improved ingress and egress road identified in the GSENM Travel Management Plan. A portion of Devils Garden ONA along the Hole-in-the-Rock Road is within the Passage Zone identified in the MMP.

The area is a public use site identified in the GSENM Visitor Information brochure; the area offers four picnic sites and a short trail for visitors to enjoy the unique sandstone formations. Devils Garden is a destination location for 53 percent of the people traveling down Hole-in-the-Rock Road. A five-year average identifies an annual site visitation of 22,995 people or 3,832 user days.

3.3.4 Non-WSA Lands with Wilderness Characteristics (BLM) and Proposed Wilderness (NPS)

Non-WSA lands with wilderness characteristics have been identified within the project area. Inventories were initiated in 1996 and published in *Utah: Wilderness Inventory* (DOI BLM 1999). On BLM-administered lands, six of the eleven proposed camping areas are on lands the BLM inventoried and found to have wilderness characteristics. The non-WSA LWC units potentially affected include North Escalante Canyon (27,410 acres), Little Egypt (19,900), and Fiftymile Mountain (12,500 acres). The BLM evaluated these six camping areas in 2011 as a part of this environmental analysis and determined that wilderness characteristics continue to be present at all six of the proposed camping areas. On NPS-administered lands, the Soda Cabin site sits adjacent

to a Proposed Wilderness Area designated in the GLCA Wilderness Recommendation (DOI NPS 1980).

During the development of this EA, BLM visited each camp location to confirm that previous inventory determinations were still appropriate. Photo documentation and a brief description of each site are included in Appendix E. This documentation will serve as a baseline source for future monitoring and will be applied to adaptive management decisions. As previously mentioned, all proposed camp sites have been located in areas where surface disturbance has occurred. Despite past surface disturbance, human impacts were determined to be substantially unnoticeable to the casual observer during the Utah Wilderness Inventory as well as the site-specific wilderness review that was completed for this project in 2011. Regardless of when the surface disturbance occurred, each of these areas has been determined to be natural in appearance because of limited use and natural reclamation. All campsites are located directly adjacent to inventory boundary roads. Therefore, the element of solitude would not be expected to be present at these sites; however, outstanding opportunities for solitude are present further inside the units or in continuous areas.

Table 5 identifies each site and its relationship to in the area.

Table 5 Non-WSA Lands with Wilderness Characteristics		
Site	Wilderness Characteristics	Description
Tenmile Corral #1	Yes	Located adjacent to HITR Road across from Tenmile corral in the boundary of the North Escalante Canyons. Area has been previously impacted by grazing operations. The camp area has a barren core of 1.4 acres; site appears to have been leveled by machinery.
Tenmile #2	Yes	Located off HITR Road across from Tenmile corral. This site is on the north side of the road along the Tenmile Wash drainage. Area is disturbed from grazing operations and camping. The camp area is .41 acres and is mostly barren with some Russian thistle.
Twentymile North	No	Located adjacent to HITR Road across at Twentymile corral. This area was excluded from inventory in 1996 because it did not meet the size criteria characteristic. The 2011 review found this site to have no wilderness characteristics because of soil compaction and lack of vegetation associated with past and ongoing grazing activity and staging for road maintenance.
Twentymile South	No	Located adjacent to HITR Road at lower Twentymile corral. This area was not found to have wilderness characteristics during the Utah Wilderness Inventory. The 2011 inventory verified that the previous determination was valid.
Countyline	No	Located on HITR Road at the Garfield and Kane county line. This area was inventoried in 1996 and found to have no wilderness characteristics. This was confirmed during the 2011 review.
Count line East #2	Yes	Located on Egypt Road along the Garfield and Kane County line. Area is frequently used by general public for dispersed camping. The camp area is .25 acres and has a small barren core due to vehicle traffic.
Big Hollow-Windmill	Yes	Located approximately 200 yards west of HITR Road on the Big Hollow Road. Area is impacted from grazing operations and camping. The camp is 1.6 acres, leveled by machinery, trash is present, and shows long term uses.
Fortymile Ridge	Yes	Located adjacent to HITR Road and is an old drill pad site. The camp is 3.4 acres, and leveled by machinery.
Fortymile Ridge Rd. #2	No	Located off the Fortymile Ridge Road approximately 1/8 of a mile north of HITR Road. The area was inventoried in 1996 and considered to have no wilderness characteristics.

Table 5 continued		
Dance Hall Rock (day use)	No	Located on spur road off HITR Road. Parking area is developed with interpretive panels. Parking area is .13 acres. Primary group uses would be recreation, education and special events. The area was inventoried in 1996 and considered to have no wilderness characteristics.
Sooner Wash	Yes	Located on a spur route off of HITR Road at mile 48. The area is .63 acres, appears to have been leveled by machinery, and shows use of cattle grazing and dispersed camping.
Soda Cabin	Adjacent to proposed wilderness.	Located on spur road south of HITR Road. Parking and camping area is .68 acres. This area was historically developed as a grazing improvement; a corral is on site and a line shack existed until it was burned in the mid 1990's. Primary uses have been grazing operations with signs of recreational camping.
Hole-in-the-Rock (day use)	No	Located at the end of HITR Road. Parking area is not developed and is .74 acres. Interpretive panels and historical markers exist. Primary group uses would be recreation, education and special events.

4.0 ENVIRONMENTAL IMPACTS

4.1 Introduction

Issues and resources to be analyzed include: cultural, recreation, wilderness study areas, and non-WSA lands with wilderness characteristics/Proposed Wilderness (NPS). Both agencies identify there is a lack of available comprehensive recreation monitoring data at this time. GSENM and GLCA anticipate increase interest by groups although the amount of increased use and user conflicts is unknown. Monitoring will provide the necessary data to track use and resource issues. Design features within all alternatives incorporate GSENM and GLCA standard stipulations and identified foreseeable issues for these activities, eliminating the need for mitigation measures at this time. As data becomes available through the monitoring process, GSENM and GLCA will review the monitoring data and apply adaptive management principles to make necessary changes for the protection of the resource while allowing for the recreation experience.

4.2 General Analysis Assumptions and Guidelines

During the development of this EA, GSENM and GLCA identified day use areas and 11 potential camp locations that may be used for large groups. GSENM and GLCA developed a site capacity calculation to aid in determining the total number of people, vehicles, tent area, toilets, and common living area needed to accommodate a group. GSENM and GLCA surveyed each site using GIS technology to create a polygon and identify the size in acres of each specific site. Based on the calculations developed, Table 4 shows the capacity of people and vehicles at each site. This information is the baseline information GSENM and GLCA used to conduct the impact analysis.

4.3 Direct and Indirect Impacts

Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.

4.3.1 Alternative A – No Action

4.3.1.1 Cultural Resources

Archaeological Resources

Under the No Action alternative, group SRP camps would not be designated and use of the proposed locations would continue on an opportunistic basis by groups of no more than 25 people. While limiting group sizes to 25 persons would place less recreational pressure on nearby historic properties, monitoring of these sites to determine recreational impacts would be on an infrequent basis. Monitoring would be less frequent than under either action alternative, and determining who was responsible for impacts to the historic properties would be difficult or impossible. However, by not designating specific camps, use of some of these locations will probably continue to be minimal while others may see an increase in use.

Ethnographic Resources

Under the No Action alternative, a large impact to the Latter-day Saints would result as it would not allow camping for large youth groups. The primary means by which they educate their members regarding this chapter in their cultural history is through re-creating the experience by bringing youth groups to the project area under sponsorship of local wards and stakes. These groups may range in size from 40-60, but may be as large as 250 or more, to mirror the 250 pioneers who undertook the 1879-80 Expedition and the way they organized themselves to accomplish the construction of the Trail. Group experience is a forceful way to renew cultural beliefs, traditions, and history. Those who come away from these organized events express the positive, even transformative, impact on their lives as members of Latter-day Saints.

This alternative would continue to accommodate groups of 25 or less Latter-day Saints who come on day trips in family groups or as individuals to learn from the places associated with the original pioneers. These places include Dance Hall Rock, Fortymile Spring, and the Hole-in-the-Rock. However, the cultural preference for learning the information these places impart is through re-creating the same or a similar form of social organization that enabled the pioneers' feat of successful passage through the Hole-in-the-Rock and eventual settlement at Bluff, Utah.

At this time, there are no known ethnographic resources associated with American Indian tribes. Review of the cultural inventory by tribes may reveal such resources.

4.3.1.2 Recreation

All areas identified in this EA would be impacted to varying degrees by the No Action alternative. GSENM would continue to issue SRP's for special events for groups of 25 people or less and GLCA would issue permits for organized groups up to 100 people for day use. This alternative would require each BLM SRP application beyond these limits to go through the NEPA process which could take extensive time to process. Camp locations would not be specifically identified for large group use. GSENM and GLCA would likely permit camping for organized groups and heritage events in many of the same locations that have been identified as appropriate for use under the action alternatives limiting new resource disturbances along the HITR corridor. Use of vehicles, ATVs, tents, toilets, and common areas in camps would result in trampling of vegetation and soil compaction. Expected impacts could also include and expanded

surface disturbance, creation of social trails, trash, fire rings, user conflicts with the general public, and temporary increased traffic on Hole-in-the-Rock Road. Limited parking at Dance Hall Rock would not create the need to park vehicles on the shoulder of Hole-in-the-Rock Road during special events. With smaller organized group use, other users could be accommodated within day use sites. Organized group camping locations would deter other recreational users from using these sites while occupied by the permitted group. Application of standard permit stipulations would minimize or eliminate many of these adverse effects. Based on group size limits and the summer use season with temperature over 100 degrees, user conflicts with the general public utilizing Hole-in-the-Rock Road to access other recreational activities (day use, hiking, camping, etc.) would be minimal in the No Action Alternative.

4.3.1.3 Wilderness Study Area

Under the No Action alternative, the BLM could allow groups of up to 25 people to use the Devil's Garden day use area. Based on existing development and recreational use in this area, permitting groups of this size would not impair the areas wilderness suitability.

4.3.1.4 Non-WSA Lands with Wilderness Characteristics (BLM) and Proposed Wilderness (NPS)

Since no camp locations would be predetermined in the No Action alternative, camping locations could be proposed by the applicant and approved by BLM/NPS as part of the permitting process. As mentioned above, the BLM would likely permit camping for smaller heritage groups, up to 25 people, in many of the same locations that have been identified as appropriate for use under the action alternatives. This would allow GSENM and GLCA to limit new resource disturbances along the HITR corridor. Dispersed camping and use of motorized vehicles could result in trampling of vegetation, soil compaction, expansion of surface disturbance, spread of non-natives species, creation of social trails, and establishment of unauthorized fire rings, which could adversely affect the naturalness of areas that have wilderness characteristics. The magnitude of impacts would depend on the number of permits issued for use of each area as well as other variables such as precipitation and revegetation. Based on the fact that these areas have been previously disturbed, are actively being used, and still retain their wilderness character, continued use at approximately the same levels (group sizes of 25 or less) is not expected to discernibly alter the conditions of these areas.

4.3.2 Alternative B – Proposed Action

4.3.2.1 Cultural Resources

Archaeological Resources

While the proposed camp locations themselves would not be placed on National Register eligible sites without prior mitigation, any historic properties within short hiking distance of a proposed camp location could be subject to more frequent visitation. Inventories have been completed at all of the proposed camp locations, and the prehistoric site types revealed and documented by these inventories are not the types of sites that would tend to attract the attention of artifact collectors. Artifact assemblages at these sites tend to be focused around the procurement and processing of grass seeds on an annual basis, and these sites tend to lack flaked stone tools such as arrow or atlatl dart points, knives, and scrapers. Common artifacts include ground stone fragments (pieces

of grinding slicks, metates, and manos) and fire-cracked rock fragments. Some sites contain lithic debitage (waste rock “chips” from the production of flaked stone tools), but the complete stone tools were missing. It is probable that some of these sites never had a significant flaked stone tool assemblage, but it is also possible that all such visible tools have been collected off the sites after more than 130 years of use along the HITS Road.

The overall affect of the Proposed Action to these sites would be minimal. Almost none of the known sites are located at the proposed camps, and visitation at these sites would be infrequent at best. While visitation may increase at some of these sites, the sites would not be impacted by casual visitation. The sites are not easily recognized as such and most visitors will not even realize they are at an archaeological site. Artifact collection at these sites would probably not be an issue because there are no artifacts that would be deemed worthy of collection by the general public. Of the three sites located at a proposed camp, the first is not eligible to the National Register, the second is a series of “moqui steps” threatened more by natural erosion than any other source of impact, and the third is found more than a meter below the present ground surface and is considered safe from camping related impacts. Based on information presented above, the BLM/NPS have determined that there would be No Adverse Effect to historic properties as a result of the Proposed Action alternative.

Ethnographic Resources

Under this alternative, the impacts to members of the Latter-day Saints would be lessened as it would accommodate the organized groups of Latter-day Saints in the 40-60 and larger range, which is the group size most often requested by Latter-day Saints. It would also accommodate day use by larger, organized groups of family members and individuals among the Latter-day Saints.

However, it would not accommodate the need for groups as large or larger than 250. The number of 250 replicates the size of the original pioneer group who undertook the 1879-80 Expedition and would enable a more authentic recreation of the pioneer experience and the learning that comes from it.

This alternative also accommodates the need to assemble and dance at Dance Hall Rock. However, limiting occupancy at Dance Hall Rock would not allow groups of 250 to dance together, as the pioneers did in 1879.

Under this alternative, camping at Fortymile Spring would not be allowed, which was a historical campsite and logistical headquarters for the Expedition. Nevertheless, other nearby, camping locations have been identified under this alternative and include Big Hollow Windmill and Fortymile Ridge. Being able to easily access Dance Hall Rock and nearby camping facilitates the re-creation of the pioneer experience and associated learning.

At this time, there are no known ethnographic resources associated with American Indian tribes. Review of the cultural inventory by tribes may reveal such resources.

4.3.2.2 Recreation

All day use sites and camp locations identified in this EA would be impacted to varying degrees. Expected impacts from the Proposed Action may include the development of

new social trails, trash, fire rings, user conflicts, increased noise, and temporary increased traffic on Hole-in-the-Rock Road. Conflicts with the general public may displace their use at Dance Hall Rock and Hole-in-the-Rock. Positive impacts for organized and heritage groups would include having an educational and heritage experience through recreational activities. GSENM and GLCA do not know what the increase demand would be for SRP's and SUP's upon the completion of this document, although both agencies expect these activities to continue. During 2010, BLM issued four permits for approximately 450 people in total, which equals 1% of all users on Hole-in-the-Rock Road. Considering future use base on the same number of permits, four permits of 145 people (580 total) would equal 1.4% of the total use on Hole-in-the-Rock Road. This permitted use represents 16.5% of the total visitation to the Hole-in-the-Rock site. Based on these figures, user conflicts may be moderate.

All GSENM and GLCA camp locations identified in this EA are previously disturbed areas. Most locations receive annual use from the general public, county road maintenance, ranchers, GSENM and GLCA. Eleven camp locations along Hole-in-the-Rock Road have been identified and analyzed for use. These locations would provide GSENM and GLCA the ability to disperse use and impacts among multiple sites. Based on Table 4 calculations for Dance Hall Rock, day use capacity equals 145 people and has limited parking capacity for nine cars in the parking lot. The additional vehicles (20) would need to park along the shoulder of Hole-in-the-Rock Road. Considering groups would want to camp close to the Dance Hall Rock Historic site because of its importance to some groups, GSENM and GLCA, reviewed camp locations and their capacities identified in Table 4. Two large capacity camp locations are within four miles of the Dance Hall Rock: Big Hollow Windmill (124 people) and Fortymile Ridge camp (265 people). Larger groups could be accommodated in other camp locations although Dance Hall Rock Historic Site does not have the capacity to accommodate more than 145 people. This alternative provides baseline numbers allowing GSENM and GLCA a starting point to monitor permitted uses and implement adaptive management decisions to protect the resource while providing a recreational experience. All permits would follow existing standard GSENM and GLCA stipulations for SRP's and SUP's (Appendices C&D). No more than one GSENM and GLCA permit would be issued for any one time period.

4.3.2.3 Wilderness Study Area

Under the Proposed Action, the BLM would allow groups of up to 65 people and 13 vehicles to use the Devil's Garden day use area at one time. Authorizing groups of this size would not preclude the use of Devil's Garden by other recreational users; however, it could have temporary impacts on solitude. Based on existing development and recreational use in this area, permitting groups of this size would not impair the areas wilderness suitability.

4.3.2.4 Non –WSA Lands with Wilderness Characteristics and Proposed Wilderness

Impacts to naturalness at the six camp sites that are located in areas with wilderness characteristics could include trampling of vegetation, soil compaction, expansion of surface disturbance, spread of invasive species, and creation of social trails. Based on the potential size of groups that could be authorized (up to 145 individuals depending on the capacity of the location), the magnitude of impacts would be greater under the

Proposed Action than under the No Action alternative (up to 25 individuals). Predetermined camp locations being considered under the Proposed Action have retained their wilderness character despite past and present use. However, increases in the amount of use could alter site conditions and create impacts that are noticeable to the casual observer. To minimize these impacts, as a design feature of the Proposed Action, the GSENM and GLCA have agreed to employ an adaptive management strategy wherein the agencies could rest or temporarily close individual camp sites to allow restoration. This decision would be based on monitoring/inventory data collected after permitted events. Based on the inclusion of this adaptive management measure, implementation of the Proposed Action would not prevent the agencies from considering protection of non-WSA lands with wilderness characteristics in a future planning effort.

4.3.3 Alternative C – Highest Use Alternative:

4.3.3.1 Cultural Resources

Archaeological Resources

Impacts to archaeological resources are expected to be the same as those under the Proposed Action. Increased user numbers are not likely to increase impacts to the proposed camp sites' cultural sites identified.

Ethnographic Resources

This alternative would enlarge the ability of Latter-day Saints to continue their cultural traditions along the HITSR corridor. It also, like the other alternatives, provides for the day use by Latter-day Saints' family groups and individuals.

This alternative accommodates the need to assemble and dance at Dance Hall Rock. However, limiting presence at Dance Hall Rock would still not allow groups of 250 or more to dance together, as they did in the winter of 1879.

Under this alternative, camping at Fortymile Spring would not be allowed. Fortymile Spring is the original, camping and logistical location of the Mormon pioneers. Being able to easily access both Dance Hall Rock and Fortymile Spring by contemporary Latter-day Saints enables the re-creation of the pioneer experience and the learning that comes from it by contemporary groups. Nevertheless, other nearby camping locations have been identified under this alternative and include Big Hollow Windmill and Fortymile Ridge.

At this time, there are no known ethnographic resources associated with American Indian tribes. Review of the cultural inventory by tribes may reveal such resources.

4.3.3.2 Recreation

Alternative C was developed based on the maximum carrying capacity of the largest camp location. The BLM has determined that the proposed Twentymile Wash North Camping Area is capable of accommodating up to 395 people based on the capacity calculations in Table 4. This proposed camping area is twenty-two miles north of Dance Hall Rock and forty-one miles north of the Hole-in-the-Rock. The camping area's location and the day use parking capacities at the historic sites of interest would create the need for additional travel and logistical coordination for permitted groups of this size. While this alternative would allow larger groups to camp and travel along the Hole-

in-the-Rock Road, it would not allow all participants to attend events at the historic sites of interest at the same time. The BLM has determined that Dance Hall Rock is not capable of sustainably accommodating groups larger than 145 people, and permitted groups would need to break up into three separate groups for special events at this location. This would also require a total of 70 vehicles to park along the shoulder of Hole-in-the-Rock Road, which would increase the likelihood of user conflicts with other recreational visitors and increase traffic congestion when vehicles are parked along HITR Road. This alternative provides GSENM and GLCA the ability to issue permits for the maximum camp capacity of 395 people although the highest capacity day use site is Hole-in the-Rock which has a capacity of 205 people.

The likelihood of user conflicts with the other GSENM and NPS visitors are anticipated to be the highest under this alternative. During 2010, BLM issued four permits for approximately 450 people in total, which equals 1% of all users on Hole-in-the-Rock Road. Considering future use base on the same number of permits, four permits of 395 people (1580 total) would equal 3.6% of the total use on Hole-in-the-Rock Road. This permitted use represents 44.5% of the total visitation to the Hole-in-the-Rock site. Based on these figures, user conflicts may be moderate.

4.3.2.3 Wilderness Study Area

Under Alternative C, impacts would be the same as those described under the Proposed Action. The BLM would allow groups of up to 65 people and 13 vehicles to use the Devil's Garden day use area at one time. Authorizing groups of this size would not preclude the use of Devil's Garden by other recreational users; however, it could have temporary impacts on solitude. Based on existing development and recreational use in this area, permitting groups of this size would not impair the areas wilderness suitability.

4.3.3.3 Non-WSA Lands with Wilderness Characteristics and Proposed Wilderness

Impacts to non-WSA lands with wilderness characteristics would be similar to impacts discussed under the Proposed Action, with the exception of impacts to Fortymile Ridge. Based on carrying capacity, Fortymile Ridge is the only campsite located within a wilderness characteristics area that is capable of accommodating groups larger than 145 individuals, which would be the maximum allowed under the Proposed Action. The Fortymile Ridge campsite, located in the Hurricane Wash wilderness characteristics area, is capable of accommodating up 262 people. The only camp location that could accommodate the maximum number of people and vehicles allowed under this alternative (395 people and 79 vehicles) is Twentymile Wash North, which was inventoried and found not to have wilderness character. Based on the number of permitted users, impacts to naturalness at Fortymile Ridge would be greater under this alternative than any other alternative. Impacts to naturalness would be proportional to increases in use. The proposed camp location at Fortymile Ridge has been previously disturbed, but vegetation has recovered to the point where the area is natural in appearance. Unlike some areas, the Fortymile Ridge camp site may not be able to withstand extensive use without altering its current condition because the area is vegetated with non-native species, and the soil, which is mostly sandy, is not compacted. As described under the Proposed Action, the BLM would monitor impacts to locations, and could rest or temporarily close sites that show signs of degradation. Based on resource conditions, rehabilitation of the site may take longer and be more labor intensive. Therefore the availability of this site for routine use by large heritage groups may be limited.

4.4 Cumulative Impacts Analysis

4.4 Cumulative Impacts Analysis

“Cumulative impacts” are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions.

4.4.1 Cumulative Impact Area (CIA)

Cultural –The cumulative impacts areas for cultural resources are the proposed camp locations and the cultural APE around those proposed camp locations. The cultural APE differed between the proposed locations, and was based on a proactive approach to cultural APE designation. Rather than setting the APE for cultural resources as the acreage proposed for each camp location, BLM archaeologists decided to define the APE as the area likely to receive casual use by campers at the proposed locations. This “likely use” was related to nearby geographic features such as rock formations, slot canyons, rock faces, hilltops, ridgelines, and other features that might attract hikers and related casual users based at the proposed camp locations. The areas of these cultural APEs varied from 48 acres at the Big Hollow Windmill location to 169 acres at the Sooner Wash location (acreage for each proposed location is detailed in cultural resources inventory report U-11-BL-0061-b).

Recreation – The cumulative impact area of analysis for recreation is the Passage Zone (GSENM) and Development Zone (GLCA) along the Hole-in-the-Rock Road corridor. These management zones are identified in the management plans as primary access to recreational destinations.

Wilderness Study Areas - The cumulative impact area of analysis for the WSA is the 640 acre Devils Garden Outstanding Natural Area.

Non-WSA Lands with Wilderness Characteristics – The cumulative impact area of analysis for the Non-WSA Lands with Wilderness Characteristics include North Escalante Canyon, Little Egypt, Hurricane Wash, and Fiftymile Mountain wilderness characteristics areas. The North Escalante Canyons, unit 8 comprises 7,863 acres of which 1.88 acres would be affected by the proposed action. Little Egypt comprises 22,284 acres of which .25 acres would be affected by the proposed action. Hurricane Wash comprises 9,018 acres of which 3.4 acres would be affected by the proposed action. Fifty Miles Mountain, unit 9 comprises 12,890 acres of which 2.23 acres would be affected by the Proposed Action.

4.4.2 Past and Present Actions

Past and ongoing actions that affect the project area include grazing operations, county road maintenance, and dispersed and commercial recreational activities. The Hole-in-the-Rock corridor is an access road to many well-known backcountry destinations, including: Devils Garden, Batty Pass Caves, Egypt slot canyons, Dry Fork slot canyons, Coyote Gulch, and the Dance Hall Rock and Hole-in-the-Rock historic sites.

Recreational use of these locations is primarily in the spring, summer and fall during milder temperatures. Several SRP's and SUP's are issued in the region for commercial outfitters. Although these commercial operators also use the Hole-in-the-Rock Road, they typically focus their tours on site-specific backcountry locations outside of the

Hole-in-the-Rock corridor that would be the primary location of any future permitted activities.

4.4.3 Reasonably Foreseeable Action Scenario (RFAS)

GSENM and GLCA have identified several reasonably foreseeable future actions that would cumulatively affect the same resources in the cumulative impact area as the proposed action and alternatives.

The BLM is considering relocating the Dry Fork trailhead in the next five years to address ongoing environmental impacts, user conflicts, and public health concerns. This project considers relocating the current trailhead to a more centralized location adjacent to or near Hole-in-the-Rock Road. The BLM would consider installing a parking lot and toilet at the trailhead as a part of this project.

The MMP identifies Dance Hall Rock as place where facility improvements may be necessary. However, there are no specific proposals to improve the Historic Site at this time.

GLCA has identified a potential need to install toilets at Hole-in-the-Rock. GLCA will access the needs for the installation of a toilet based on future needs and demands by the general public and permitted groups,

GLCA is currently in the scoping phase of an EIS for the development of a new ORV Management Plan.

4.4.4 Cumulative Impact Analysis

4.4.4.1 Cultural

Archaeological Resources

The cumulative impacts to cultural resources from past, present, and reasonably foreseeable action include site visitation and the potential for artifact collection. The Proposed Action alternative will not contribute to a measureable increase in impacts to the related cultural resource sites, as the proposed camp locations are already in use by the general public, and the related cultural resource sites already receive visitation on a casual basis. In addition, none of the related sites contain artifacts of types likely to be recognized and collected. While in some cases these cultural resource sites may receive additional visitation under the Proposed Action alternative, any additional visitation will not lead to a measurable increase in adverse impacts. The No Action alternative actually has the potential to lead to more cumulative impacts in that the users of the camp locations would not be closely supervised by group leaders and would not be regulated under SPR and/or SUP stipulations.

Ethnographic Resources

The cumulative impacts to ethnographic resources from past, present and reasonably foreseeable action consist of site visitation along the Hole-in-the-Rock corridor. Neither, the Proposed Action alternative nor the highest use alternative would contribute to a measureable increase in cumulative impacts to identified ethnographic resources along the corridor as the proposed camp locations and day use areas are already in use by the general public. Specific ethnographic resources such as Dance Hall Rock, the engineered passage down the cliff wall to the Colorado River and the inscriptions along this passage are already described by interpretive media at these locations. Heritage and reenactment groups whose visits are facilitated through the proposed action will use these

ethnographic resources, but the impacts would be negligible due to the size of the projected increase in overall visitation along the Hole-in-the Rock (1-3.6%) plus the heightened awareness these groups possess concerning the value of the preservation of these ethnographic resources.

4.4.4.2 Recreation

Cumulative impacts to recreational resources would be negligible as a result of the Proposed Action or alternatives. The GSENM and GLCA estimate that public visitation on the Hole-in-the-Rock corridor would increase by approximately 1% to 3.6% by approving these permit applications. Therefore issuing the permits, combined with current activities and RFAS, are not likely to noticeably increase the number of visitor to the area. Furthermore, SRP's and SUP's allow GSENM and GLCA to incorporate permit criteria reducing recreation impacts by isolating camping and day use sites identified in this EA. The adaptive management approach would consider the pre- and post-monitoring of special events to make adjustments for future events.

4.4.4.3 Wilderness Study Areas

The cumulative effects to WSA's from past, present and reasonably foreseeable action include past developments at the Devil's Garden area and day use recreation. Based on current high levels of use in the area, the Proposed Action and Alternative C would have minimal cumulative effects and would not impact the areas wilderness suitability. The No Action Alternative will not result in an accumulation of effects to WSAs.

4.4.4.4 Non-WSA Lands with Wilderness Characteristics and Proposed Wilderness

Implementation of all alternatives could result in impacts to naturalness. Impacts would be greater under alternatives that allow higher levels of use.

Camp locations account for a total of 7.75 acres out of 62,730 acres in all four units. In addition, camp locations account for less than 0.0001% of the non-WSA with wilderness character in the GSENM. Other activities occurring within these inventoried areas that have potential to impact wilderness characteristics include dispersed and commercial recreation and livestock management activities. The impacts associated with these activities are difficult to quantify.

Soda Cabin is adjacent to proposed wilderness in GLCA. The site has been in use for many years by grazing operations as a corral with line shack. Use of this site for equestrian and reenactment groups would create minimal impacts or user conflicts. Based on adaptive management, all of the areas are expected to retain their wilderness character and the agencies would not be prevented from considering protection of these areas as part of a future planning effort.

5.0 CONSULTATION AND COORDINATION

5.1 Introduction

The issue identification section of Chapter 1 identifies those issues analyzed in detail in Chapter 4. The ID Team Checklist provides the rationale for issues that were considered but not analyzed further. The issues were identified through the public and agency involvement process described in sections 5.2 and 5.3 below.

5.2 Persons, Groups, and Agencies Consulted

Table 5

List of all Persons, Agencies and Organizations Consulted for Purposes of this EA.

Name	Purpose for Consultation or Coordination	Findings & Conclusions
Rob Sweeten, BLM, UTSO Landscape architect	Consultation on capacity calculations	Provided GSENM with initial spatial dimensions for camping units, group use areas, and staging areas. He concluded GSENM calculations were sufficient for this project.
Jeff McCusker, BLM, ORP - Eastern States and RVSAT team member	Consultation on capacity calculations	Based on Burning Man camp allocations, Jeff provided GSENM with initial capacity calculations and concluded GSENM calculations were sufficient for this project.
Cory Roegner, BLM, Black Rock FO ORP, Nevada	Consultation on capacity calculations	Based on Burning Man camp allocations, Cory provided GSENM with capacity calculations and concluded GSENM calculations were sufficient for this project.
Dave Barfuss, BLM, CCDO District Engineer	Consultation on capacity calculations	Provided feedback on vehicular circulation and parking spatial requirements and concluded that GSENM calculations were sufficient for this project.
Jared Oakley, BLM Outdoor Recreation Planner, Lander, Wyoming FO	Contacted to research Mormon Trail permit system.	Provided example of EA for Lander FO.
Brian Bremner, Garfield County Engineer	Apprise the county as to the development of the project.	Provided comments to GSENM on duration of stay and road concerns while on Public lands.

Table 5 Continued		
Sam Spencer, Wendell Roundy, Dell LeFevere, Gary Allen, Randy Gleave, Todd Phillips, Myron Carter, Luke Hatch, Darrell Spencer	Grazing Permit holders along Hole-in-the-Rock Road. Meeting at BLM Escalante office on January 25, 2011.	Permits holders were opposed to BLM using cattle corrals due to the potential that grazing improvements may be damaged and restitution would be difficult to collect. GSENM and GLCA identified three locations, Tenmile and Twentymile and Soda Cabin for limited uses. See Table 1 for details.
Utah Department of Transportation	Acquisition of State Route 12 traffic reports	Provided Highways 12 traffic reports.
Glen Canyon National Recreation Area, National Park Service	Partner in development and completion of EA.	Provided data, staff and specialist to complete EA.
Escalante Heritage Center, Jerry Roundy	Consulted to learn more on the development of the Heritage Center and future interest to Dance Hall Rock and Hole-in-the-Rock sites	Mr. Roundy provided GSENM background on this site and the purpose of the Heritage center is to educate people on the historical significance of the Hole-in-the-Rock expedition.
Hole-in-the-Rock Foundation,, Lyn Stevens, Graig Taylor, and Lamont Crabtree, Bluff, Utah	Official descendants' group of the Hole-in-the-Rock Expedition. Consulted to learn the importance of the event and the places associated with it.	Provided GSENM/GLCA with a list of the ethnographic resources associated with the Trail, statements of significance, and various administrative documents that help in planning and management.
History Department, The Church of Jesus Christ of Latter-day Saints, Steven Olsen, Ph.D., Senior Curator, Historic Sites, Salt Lake City, Utah	To obtain the perspective of the LDS Church on the significance of the Hole-in-the-Rock Trail.	Dr. Olsen provided GSENM/GLCA insights into the meaning of the Hole-in-the-Rock experience in the context of Church history and Mormon culture.
Steven Dodds, Cedar City Stake, Cedar City, Utah	Organized the youth group of 250 that reenacted the Expedition in June of 2010	Provided GSENM/GLCA with information about the logistics of organizing a large group, identified the significance of the Expedition, as well as the meaning the Hole-in-the-Rock corridor still holds for Latter-day Saints.
Rich Harvey, Richfield 14th Ward, Richfield, Utah	Organized a youth group of 42 that reenacted the pioneer trek in June of 2010	Provided GSENM/GLCA with information about the logistics of organizing a youth group, identified the significance of the Expedition, as well as the meaning the Hole-in-the-Rock corridor still holds for Latter-day Saints.

Table 5 Continued		
Steve Lund, Bishop, Manti 4th Ward, Manti, Utah	Is organizing a youth group of 52 youth for a day trip in July 2011.	Provided GSENM/GLCA with information about the logistics of organizing a youth group, identified the significance of the Expedition, as well as the meaning the Hole-in-the-Rock corridor still holds for Latter-day Saints.
Gayle Pollack, Bishop, Tropic Ward, Tropic, Utah	Organized a youth group of 52 in May of 2010.	Provided GSENM/GLCA with information about the logistics of organizing a youth group, identified the significance of the Expedition, as well as the meaning the Hole-in-the-Rock corridor still holds for Latter-day Saints.

5.3 Summary of Public Participation

On October 22, 2010 GSENM and GLCA (NPS) met to discuss this project. The decision was made to work in cooperation, GSENM and GLCA, to develop an EA that would meet both agencies needs. The rationale for this decision was that most users will want to visit Hole-in-the-Rock site if visiting Dance Hall Rock for the historical experience. Dance Hall Rock is within GSENM and Hole-in-the-Rock is within GLCA. A scoping letter was sent out On November 18, 2010 to 200+ interested parties via GSENM and GLCA mailing lists. The comment period ended on December 12, 2010. No public meetings were held due to the localized nature of this project. The EA was posted to ENBB on November 18, 2010.

Eleven comment letters were received; staff compiled and organized public comments received to be brought forward in the EA analysis. On January 25, 2011 BLM GSENM met with Ranchers who hold grazing allotments along HITR Road; 14 people attended including Dell LeFevre, Garfield County Commissioner. On February 17, 2001 GSENM sent out day use and camp location number analysis to other BLM Recreation Planners for input. A NEPA interdisciplinary team meeting was held on March 2, 2010. Mr. Jerry Roundy represented the Escalante Heritage Center at the March 2nd meeting to discuss the projected future needs for visitation down Hole-in-the-Rock Road. Mr. Roundy supported BLM's efforts in being proactive to support larger group permits to the area. GSENM management team sent EA alternatives to Garfield County Engineer for review on March 17, 2011. Garfield County submitted comments to GSENM for consideration.

5.4 List of Preparers

Table 5.4 List of Preparers

Name	Title	Responsible for the Following Section(s) of this Document
Jabe Beal	Project Lead, Outdoor Recreation Planner	Preparation of document, impact analysis for recreation, wilderness study areas, and non-WSA lands with wilderness characteristics
Joseph David	NEPA Coordinator	Liaison for GSENM and GLCA NEPA teams, NEPA compliance
Allysia Angus	Landscape Architect	Day use and camp location capacity calculations
Matthew Zweifel	Archaeologist	Cultural, Archaeology, Native American concerns
Rosemary Sucec	Chief of Cultural Resources, GLCA	Cultural, Ethnography

6.0 REFERENCES, GLOSSARY AND ACRONYMS

6.1 References

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Department of the Interior. *Presidential Proclamation 6920*. 1996

Grand Staircase – Escalante National Monument. *Monument Management Plan*, 2000.

Miller, David E. 1966 [1959] Hole in the Rock. An Epic in the Colonization of the Great American West. University of Utah Press, Salt Lake City.

National Register of Historic Places, Hole-in-the-Rock Trail, Garfield, Kane, and San Juan counties, Utah, National Register #82004792

National Register of Historic Places, Hole-In-The-Rock, Garfield, Kane, and San Juan counties, Utah, National Register #75000165

Traffic Statistics. 2011. Utah Department of Transportation.
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US Department of Interior, Bureau of Land Management, *UTAH, Wilderness Inventory*. 1999.

6.3 List of Acronyms

BLM – Bureau of Land Management

EA – Environmental Assessment

ER - Equestrian and reenactment groups

GLCA – Glen Canyon National Recreation Area, National Park Service

GSENM – Grand Staircase – Escalante National Monument, Bureau of Land Management

LDS – Church of Jesus Christ of Latter-Day Saints

LWC – Lands with Wilderness Characteristics

HITR – Hole-in-the-Rock Road

MMP – Monument Management Plan (GSENM)

NEPA – National Environmental Policy Act

NPS – National Park Service

ONA – Outstanding Natural Area

SRP – Special Recreation Permit (BLM)

SUP – Special Use Permit (NPS)

APPENDICES

APPENDIX A GSENM - Interdisciplinary Team Checklist

APPENDIX B Capacity calculations

APPENDIX C GSENM SRP Standard Stipulations

APPENDIX D GLCA SUP Standard Stipulations

APPENDIX E Non-WSA Lands with Wilderness Characteristics Descriptions

APPENDIX F SHPO Concurrence Letter

APPENDIX A

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Programmatic EA for Organized Groups on Hole-in-the-Rock Road

NEPA Log Number: DOI-BLM-UT-030-2010-0008-EA

File/Serial Number: DOI-BLM-UT-030-2010-0008-EA

Project Leader: Jabe Beal

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for relevant impact that need to be analyzed in detail in the EA

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form. The Rationale column may include NI and NP discussions.

Determi- nation	Resource	Rationale for Determination*	Signature	Date
RESOURCES AND ISSUES CONSIDERED (INCLUDES SUPPLEMENTAL AUTHORITIES APPENDIX 1 H-1790-1)				
NI	Air Quality (Norman)	The camping areas proposed are on sites previously disturbed totaling 15 acres. The project locations are small and very remote. Any particulates generated traffic to and from the project would be quickly dispersed and non measurable.	/s/Jack Norman	3/11/11
NP	Areas of Critical Environmental Concern	No Areas of Critical Environmental Concern (ACECs) are designated in the Monument Management Plan.	/s/ J. Beal	4/18/11
NI	Biological Soil Crusts (Anderson)	Potential for impact beyond the disturbed sites would be minimized by flagging camp locations. No impacts to currently disturbed sites.	K. Anderson	22 Mar 2011
NP	BLM Natural Areas	No Natural Areas are designated in the Monument Management Plan.	/s/ J. Beal	4/18/11
PI	Cultural Resources (Zweifel)	Implementation proposed project has the potential to impact Historical Sites, ethnographic resources, and Traditional Cultural Properties that are important to the LDS Church. Cultural Resource inventories for this project have been completed and a finding of "No Adverse Effect" has been arrived at by BLM specialists. SHPO concurred with this determination.	/s/ M. Zweifel	4/20/2011
NI	Greenhouse Gas Emissions (Norman)	The project areas are small in size totaling 15 acres and are located in a remote area. Vehicle emissions would occur from the vehicle capacities described in the alternatives. The emissions would disperse fairly quickly and are not measurable.	/s/Jack Norman	3/11/11
NP	Environmental Justice	According to the EPA Region VIII, State of Utah, Environmental Justice Map, the region has been categorized as a minority population area of 0-10% and a poverty population area of 10-20%. No minority or economically disadvantaged communities or populations are present which could be affected by the proposed action or alternatives. (see http://www.epa.gov/enviro/ej , 03/12/06).	/s/Joe David	4/18/11
NP	Farmlands (Prime or Unique)	No Prime or Unique Farmlands exist within the Monument. (see http://www.ut.nrcs.usda.gov/technical/nri/1997resultscropland .)	/s/ J. Beal	4/18/11
NI	Fish and Wildlife Excluding USFW	Sensitive species in the area include golden eagle, kit fox, and burrowing owl. These species are rare in this area. No golden	/s/Terry Tolbert	3/14/2011

Determination	Resource	Rationale for Determination*	Signature	Date
	Designated Species (Tolbert/McQuivey)	eagle nesting areas are near the proposed campsites. Kit fox and burrowing owls are active during the nighttime hours when traffic should be absent to minimal. The proposed campsites do not contain burrows suitable for these species. Species present in the area marginally use the proposed campsites but are able to avoid impacts that occur by moving out of the area or remain inactive for the duration of camping activities.		
NI	Floodplains (Norman)	There are narrow linear floodplains along ephemeral washes in the vicinity of 5 campsite locations based on GIS maps. These are several hundred yards away and would not be impacted by campsite activities.	/s/Jack Norman	3/11/11
NI	Fuels/Fire Management (Bate)	Ground cover is sparse in and around the proposed camp sites.	Alan Bate	4/21/1
NI	Geology / Mineral Resources / Energy Production (Titus)	Entire proposed route and camp locations are on exposures of the Jurassic Carmel and Entrada formations. No known significant mineral or geomorphic resources would be affected by larger SRP groups on the HITR route. No current energy leases or mineral claims are present along the route.	/s/ Alan Titus	3/2/2011
NI	Hydrologic Conditions (Norman)	The proposed activities are not expected to alter any existing surface water run-off patterns.	/s/Jack Norman	3/11/11
NI	Invasive Species / Noxious Weeds (Hughes)	There are 98 documented plant species that are non-native on the Monument. Seven of these are State listed Noxious weeds. Because these areas are currently free of State listed Noxious weeds and other new invasive species of concerns that may be on the horizon, prevention should be taken to reduce the risk of these species from invading these sites. Precautionary standards are stated in the Standards and stipulations of the SRP permit and the design features within the EA. The camp sites and the Road will also be monitored for these types of species annually. Early Detection and Rapid Response will occur if State listed or new invasive plant species are discovered in these areas.	/s/ Amber Hughes	5/8/11
NI	Lands/Access (Beal)	Hole-in-the Rock Road is a county maintained road although no Lands and Realty actions are identified in this EA. This action would not encroach upon any identified rights.	/s/ Jabe Beal	3/17/11
NI	Livestock Grazing (J. Bybee)	Potential impact from use of proposed camp locations adjacent to range improvement structures and impacts associated with the recreational use of these proposed areas during the livestock grazing season. Design features address this concern through campsite type and season of use.	/s/Jason Bybee	3/9/2011
NI	Migratory Birds (Tolbert, McQuivey)	All locations are in disturbed sites where camping occurs adjacent to the Hole-in-the-Rock Road. Migratory birds are able to avoid these areas and do not use them because of the disturbance.	/s/Terry Tolbert	3/14/2011
PI	Native American Religious Concerns (Zweifel)	Native American consultation has been initiated, to-date only the Hopi and Navajo have responded. The Navajo (letter of 3/28/11) indicate that they have no concerns regarding this project. The Hopi (letter of 11/29/10) have requested a copy of the cultural resources report for their review.	/s/ M. Zweifel	4/20/2011
NI	Paleontology (Titus)	Entire GSENM route and campsites for the proposed action will be located on outcrops of the Jurassic age Carmel and Entrada Formations. Although the very top of the Entrada has been found to contain significant dinosaur track fossils, these are not located close to where the proposed activity would occur. The geological interval near the road and campsites is virtually barren of significant fossils and no known sites are present. Survey not required because of their low potential.	/s/Alan L. Titus	2/23/2011

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Rangeland Health Standards (J. Bybee)	The proposed camp locations identified in the proposed action have all been documented as previously disturbed. Under Rangeland Health Assessment guidelines these areas would not qualify as assessment sites. Additionally these areas are primarily less than 5 acres in size and any disturbance resulting from group camping and day use will have no impact on Rangeland Health Standards as defined at an allotment level.	/s/Jason Bybee	3/9/2011
PI	Recreation (J. Beal)	Expected impacts to these sites may include footprints along trails and social trails, trash, user conflicts with the general public, traffic on Hole-in-the-Rock Road and limited parking at Dance Hall Rock may create the need to have cars park on Hole-in-the-Rock Road during special events. GSENM and GLCA do not expect a large increase in SRP's and SUP's upon the completion of the document, although both agencies expect these activities to continue. The EA design features identify these potential conflicts and will apply adaptive management principle to adjust permit allocations to protect resources.	/s/ Jabe Beal	4/1/2011
NI	Socio-Economics (EPC)	May provide temporary beneficial impacts to local visitor service-oriented businesses. Level of use would not result in large impact on these businesses in the context of the full year's operations. Though HITR and DHR are of importance to the local community and Latter-Day Saints, this is addressed in the Cultural Resources section.	/s/Joe David	4/18/11
NI	Soils (Norman)	The camping areas proposed are on sites previously disturbed totaling 15 acres. All camping locations, vehicle parking, and toilet areas are proposed for areas of previously disturbed soils that will be delineated for the campers by flagging. There would be some casual walking outside of delineated campsite areas. This activity which is currently permitted would not result in any impact to area soils.	/s/Jack Norman	3/11/11
NP	Threatened, Endangered, Candidate Plant Species (Anderson)	Only 1 site, Cat Well, has Potential Impact to a Federally listed Endangered plant species, based on GIS soil data. No other proposed sites have T&E issues. If Cat Well is removed from consideration then Determination is Not Present.	K.Anderson	22 March 2011
NP	Threatened, Endangered or Candidate Animal Species (Tolbert, McQuivey)	There are no known species or designated critical habitat included in this proposal	/s/Terry Tolbert	3/14/2011
NP	Wastes (Hazardous or Solid) (Pierson)	There are no hazardous wastes associated with this project.	/S/Brett Pierson	3/1/2011
NP	Water Resources/Quality (drinking/surface/ground) (Norman)	They are not present based on GIS data.	/s/Jack Norman	3/11/11
NI	Wetlands/Riparian Zones (Anderson)	Some proposed areas are near (few hundred yards) riparian areas but are not in the riparian themselves.	K. Anderson	8 Mar 2011
NP	Wild & Scenic Rivers (C. Stewart/Beal)	No Wild and Scenic Rivers are within the Hole-in-the-Rock Corridor.	/s/ Jabe Beal	3/17/11
PI	Wilderness Study Areas (C. Stewart/Beal)	Day use at Devil's Garden has potential to impact wilderness characteristics in the Devil's Garden Outstanding Natural Area, which is managed under IMP. The proposed project is not within a Wilderness Study Area. Scorpion WSA boundary is on the North side of Hole-in-the-rock Road adjacent to Big Hollow Windmill camp location. The camp location is not within WSA.	/s/ Jabe Beal	3/17/11
NI	Woodland / Forestry (Bate)	Firewood for camp fires would be brought in from an outside source. So there would be no impacts to the few juniper trees that are located near the proposed camp sites.	A.Bate	3/14/11

Determination	Resource	Rationale for Determination*	Signature	Date
NP	Vegetation Excluding USFW Designated Species (Hughes)	There are no known special status species or their habitats at these sites.	/s/ Amber Hughes	3/11/11
NI	Visual Resources (Angus)	Proposed corridor where activities would take place is within VRM Class II where the objective is to maintain the existing character of the landscape. The activities associated with all alternatives are transitory and do not include the construction of permanent facilities. Though the elements associated with group camping/gathering (vehicles, tents, people, etc.) would be seen by casual observers travelling along Hole-in-the-Rock Road while events are being conducted, they would not alter the characteristic landscape for the long term. Thus, all alternatives would meet the objectives of VRM Class II.	/s/ AAngus	02/24/11
NP	Wild Horses and Burros (S. Stewart)	There are no active WHMAs within the boundaries of the GSENM.	/s/ Sean Stewart	2/28/11
PI	Areas with Wilderness Characteristics (C. Stewart/Beal)	Lands with Wilderness Characteristics are present and use is proposed within LWC.	/s/ J. Beal	4/18/2011

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
Environmental Coordinator			
Authorized Officer			

APPENDIX B - Capacity calculations

Camping Calculations

60 ppl (5 ppl/vehicle)

					TOTAL SF	TOTAL AREA SF	ACRES	TOTAL ACRES
CAMPING (living area)/Vehicle								
Living area/vehicle								
	# of vehicles	area dimensions	area needed/SF					
5 ppl/vehicle	12.0							
25% w/trailers	3.0	35x35	1225	3675				
75% w/o trailers	9	30x30	900	8100				
					11775			
Tent area								
4 ppl/tent	15	16x16	256	3840				
					3840			
					15615	0.36		
GROUP GATHERING AREA/person								
60 ppl			25	1500				
					1500	0.03		
PARKING AREA FOR PORTABLE TOILETS (assumes 2 toilets per trailer)								
	# of toilets	area dimensions	area needed/SF					
30 ppl/toilet	2	10X50	500	500				
					500	0.01		
						Subtotal		0.40
CIRCULATION (pedestrian/vehicular)	Total area for other uses x 100%							
						0.40		0.40
						TOTAL		0.81
						Acres/person		0.013

NOTES:

43560 SF = 1 ACRE

Difference in living area SF for vehicles with and without trailers is based on:

Parking SF for vehicle w/trailer	10x50	500
Parking SF for vehicle	10x20	200

Additional area: 300

APPENDIX B - Continued

Day use Calculations

60 ppl (5 ppl/vehicle)					TOTAL SF	TOTAL AREA SF	ACRES	TOTAL ACRES
PARKING								
	# of vehicles	area dimensions	area needed/SF					
5 ppl/vehicle	12	10x20	200	2400				
						2400	0.06	
GROUP GATHERING AREA/person								
60 ppl			25	1500				
						1500	0.03	
PARKING AREA FOR PORTABLE TOILETS (assumes 2 toilets per trailer)								
	# of toilets	area dimensions	area needed/SF					
30 ppl/toilet	2	10X50	500	500				
						500	0.01	
							Subtotal	0.10
CIRCULATION (pedestrian/vehicular)								
	Total area for other uses x 100%						0.10	0.10
							TOTAL	0.20
							Acres/person	0.003

NOTES:

43560 SF = 1 ACRE

Appendix C – Grand Staircase – Escalante National Monument

Standard SRP Stipulations

SPECIAL RECREATION PERMIT (SRP) STIPULATIONS

GENERAL

- 1) Permittee shall follow all procedures and requirements set forth in the Monument SRP Policy.
- 2) Permittee shall comply with all stipulations listed on the back of Form (2930-1).
- 3) For “multi-year” SRPs, two consecutive seasons of nonuse may result in cancellation of the SRP and would require the permittee to apply for a new SRP.

APPLICABLE LAWS AND REGULATIONS

- 1) The permittee shall comply with all Federal, State, and local laws, ordinances, regulations, orders, postings, or written requirements applicable to the area or operations covered by the SRP. The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses, permits, and/or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents, employees, and/or representatives of the permittee and by all clients, customers, or participants under the permittee’s supervision.
- 2) SRPs for commercial recreation uses requiring a license or licenses from the State of Utah (i.e., outdoor youth programs, hunting guides), will be valid only when accompanied by a valid State license (public utility commission (PUC) certificate).

NON-ESCLUSIVE USE

- 1) Unless expressly stated, the SRP does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the Federal land by other users. The United States reserves the right to use any part of the area for any purpose.
- 2) Unless use allocations are in place, the public lands will generally remain available on a first-come first-served basis to as many other commercial and private users as desire to use them, except as otherwise provided for in these stipulations. Nothing herein implies that the first permittee into any area has been authorized an exclusive use privilege.
- 3) Nothing in this SRP will be construed as license for the permittee, employees, or clients to use an area of the public lands which are otherwise restricted or closed e.g., restrictive off-highway vehicle designation area.

CONDUCT AND MANNERS

- 1) The permittee is at all times responsible for the actions of himself, his employees, and guests in connection with the authorized operations, and shall not cause a public disturbance or engage in activities which create a hazard or nuisance.
- 2) Aside from the LEAVE NO TRACE land ethics included as stipulations, permittees are strongly encouraged to follow the other LEAVE NO TRACE land ethics and TREAD LIGHTLY land ethics (Appendix 8) and inform their clients about these practices and ensure that they follow them.
- 3) The permittee shall inform both the employees, agents and representatives, and the clients, customers and participants under its supervision, of the terms and conditions of the authorized SRP.
- 4) No one shall intentionally or wantonly destroy, deface, remove, or disturb any public building, sign, equipment, marker, or other government property, cultural sites, historic structures, natural features of the land, vegetation, or wildlife, except as legally taken.

MODIFICATION, AMENDMENT, OR CANCELLATION

- 1) A SRP authorizes special uses of the public lands and related waters and, should circumstances warrant, the SRP may be amended or modified by the Monument at any time, including the amount of use. The Monument may suspend, or cancel a SRP, if necessary, to protect public resource, health, safety, the environment, or noncompliance with SRP stipulations.

FINANCIAL

- 1) No value shall be assigned to or claimed for the SRP, or for the occupancy or use of Federal lands or related waters granted thereupon. The SRP privileges are not and shall not be considered to be protected property interests, which the permittee shall be entitled to earn or receive any return, income, price or compensation. The use of a SRP as collateral is not recognized by the BLM.

FEES

- 1) If permittee fails to submit any required form or fee by the specified deadline, an Annual SRP Authorization will not be issued until the form or fee is received and processed by the Monument, and late fees will be assessed using the following schedule:
 - 2 weeks late = \$100.00 fine,
 - 3 weeks late = \$250.00 fine, and
 - 4 weeks late = \$500.00 fine.
- 2) The permittee shall pay visitor use fees for each of its clients recreating in fee areas.

TRANSFERS AND OWNERSHIP

- 1) A SRP may be transferred at the discretion of the Monument.
- 2) In the event of default on any mortgage or other indebtedness, such as bankruptcy, creditors shall not succeed to the operating rights or privileges of the permittee's SRP.

INSPECTIONS OF RECORDS AND PREMISES

- 1) The permittee must present or display a copy of Form (2930-1) and its Annual SRP Authorization to Monument personnel, or law enforcement officers upon request. If required, the permittee must display a copy of the SRP or other identification tag on equipment used during the period of authorized use.

- 2) The Monument, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the SRP, held by or in the custody of the permittee or the permittee's operator, employee, or agent for up to 3 years after expiration of the SRP.

RESOURCE PROTECTION

General

- 1) The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.
- 2) Hammering nails into trees is prohibited.

Archaeological/Cultural

- 1) All persons associated with operations under this SRP must be informed that any objects or sites of cultural, paleontological, and scientific interest, such as historic or prehistoric resources, graves or grave markers, human remains, ruins, cabins, rock art, fossils, or artifacts shall not be damaged, destroyed, removed or disturbed. If in connection with operations under this SRP any of the above resources are discovered, the permittee shall immediately stop operations in the immediate area of the discovery, protect such resources, and notify the Monument as soon as possible of the discovery.

Camping

- 1) Dispersed primitive camping is not allowed in the Frontcountry and Passage Zones. Camping in the Frontcountry and Passage Zones must be in developed campgrounds or in designated primitive camping areas. Designated primitive camping areas have not been identified in the Monument to date. Therefore, if a permittee intends to camp in areas not designated as primitive camping areas in the Frontcountry and Passage Zones, they must identify these areas in their operating plans.
- 2) Motorized or mechanized vehicles may pull off designated routes no more than 50 feet for direct access to dispersed camping areas in the Outback Zone, except in Wilderness Study Areas, endangered plant areas, relict plant areas and riparian areas.
- 3) Camping within 200 feet of an isolated water source, i.e., spring, pond, rock pool, water pocket, is prohibited.
- 4) Permittee will maintain all premises to standards of repair, orderliness, neatness, and sanitation acceptable to the Monument. Camp locations will be regularly cleaned and no trash or litter will be allowed to accumulate.
- 5) Food and/or equipment caches will not be allowed unless prior approval is obtained from the Monument. Location of proposed caches must be identified in the permittees operating plan.

Collections

- 1) Collection of Monument resources, objects, rocks, petrified wood, fossils, plants, animals, fish, insects or other invertebrate animals, bones, waste, or other products from animals, or of other items from within the Monument is prohibited. The collection of small amounts of fruits, nuts, and berries for personal, noncommercial use is allowed.

Fire

- 1) Campfires are not allowed in the Escalante and Paria/Hackberry Canyons, No Mans Mesa, and in archaeological sites, rock shelters and alcoves throughout the Monument. Appendix 7 further defines these no campfire areas.
- 2) Campfires are allowed only in designated fire grates, designated fire pits, or mandatory fire pans in Frontcountry and Passage Zones. However, wood collection for campfires is not allowed in Frontcountry and Passage Zones, therefore you must bring your own.
- 3) Campfires are allowed in Outback and primitive Zones. The use of fire pans are encouraged and only dead and down wood can be collected or bring your own. Burn wood to ashes and douse with water, making sure that your fire is DEAD OUT and that the area is restored to a natural condition before leaving.
- 4) When using designated fire grates or designated fire pits in the Frontcountry and Passage Zones, burn all wood and coals to ash, put out campfires completely, then leave cool ashes.
- 5) If using a mandatory fire pan in the Frontcountry and Passage Zones, burn all wood and coals to ash, put out campfires completely, then pack out cool ashes.
- 6) If constructing a fire in the Outback and Primitive Zones, use an existing fire ring, instead of building a new one. Also, burn all wood and coals to ash, put out campfires completely, than scatter cool ashes.
- 7) The use of billy can stoves in areas where fires are not allowed is prohibited.
- 8) Permittee may be held responsible for fire suppression costs resulting from wildfire caused by the permittee, and its employees, agents, and/or representatives and by all clients, customers and participants under the permittee's supervision.
- 9) Wildfires should be reported immediately to the nearest BLM office. Permittee is responsible for informing employees, clients, and participants of the current fire danger and required precautions that may be placed in effect by BLM or the State of Utah.

Group Size Limits

- 1) Group size is limited to 25 people in the Passage and Outback Zones including guides.
- 2) Group size within the Primitive Zone is limited to 12 people and 12 pack animals including guides, however within the Paria River corridor in the Primitive Zone group size is limited to 25 people including guides.
- 3) Group size limits cannot be achieved by staggering individual groups along a single route by time or distance. Instead, individual groups must comply with group size limits by utilizing separate and unique routes, or by traveling from opposite ends of a single route. If traveling from opposite ends of a single route, groups may pass each other, however they cannot gather at a single location.

Wilderness Study Areas

- 1) Permittee is responsible for knowing where wilderness study areas (WSA) and other special management areas (i.e., Area of Critical Environmental Concern, Research Natural Area, etc.) are and use restrictions that may apply to such areas. Maps and information concerning restrictions are available at the Monument.

TRANSPORTATION AND ACCESS

- 1) All machinery (street legal motorized vehicles, non-street legal all-terrain vehicles, dirt bikes etc.) that has been used outside the Monument must be cleaned prior to use in the Monument, to prevent the possible introduction and spread of noxious weeds.
- 2) Access onto the Monument will be along defined roads listed on the transportation map in the Grand Staircase-Escalante National Monument Management Plan.
- 3) Cross-country motorized travel on the Monument is prohibited. All motorized and mechanized (bicycles, deer carts) vehicles must stay on designated roads while traveling in the Monument.
- 4) Permittee shall not construct new trails, or maintain existing trails without written authorization from the Monument.
- 5) The permittee shall not use paint or flagging, or construct cairns to mark trails, unless specifically allowed for in its Annual SRP Authorization.

SANITATION AND AESTHETICS

- 1) Operation and maintenance of all sanitation, food service, and water supplies systems, and facilities shall comply with the standards of the local department of health and the United States Public Health Service.
- 2) Pack it in, pack it out. Inspect your campsite and rest areas for trash or spilled foods. Pack out all trash, leftover food, litter, and toilet paper and hygiene products.
- 3) Burning and burying food waste is prohibited.
- 4) Permittees in an area where there is less than a 200-foot distance (about 85 adult steps) from water sources, camp, and trails must use a portable self-contained toilet system. All human waste must be packed out and disposed of at a certified disposal site.
- 5) If a small portable toilet cannot be used, deposit solid human waste in catholes dug 4 to 6 inches deep at least 200 feet (about 85 adult steps) from water sources, camp, and trails. Cover and disguise the cathole when finished. Never dig a cathole under an overhang or shelter.
- 6) If necessary, i.e., camping in one location for multiple days, a trench may be dug to dispose of human waste. To dig a trench, start with a cathole dug 4 to 6 inches deep and expand it in one direction as additional people use it; soil dug from the trench should be used to cover the feces.
- 7) If camping in an area for more than one night, cathole sites must be widely distributed.
- 8) To wash yourself or your dishes, carry water 200 feet away from water sources and use small amounts of biodegradable soap. Scatter strained dishwater and pack out remaining food particles.
- 9) Wash water must be emptied over sand, gravel, or another filtering surface.

SAFETY AND EQUIPMENT

- 1) The permittee shall provide the equipment necessary to serve the clients, customers, and/or participants under its supervision in a safe manner.
- 2) A copy of any accident report involving property damage (in excess of \$200.00), personal injury, or death must be submitted to the Monument within ten days of the accident. Other accidents shall be reported in the Post Use Report.
- 3) The permittee shall carry a major first aid kit on all permitted trips. A minor first aid kit is required to be with each sub-group should a trip be split into more than one activity.
- 4) Unless specifically authorized in the SRP, discharge of firearms is allowed only for legal pursuit of game animals by a licensed hunter.
- 5) Use of explosive, pyrotechnics, and fireworks is prohibited.
- 6) The permittee must assume responsibility for inspecting the permitted area for any existing or new hazardous conditions, e.g., trail and route conditions, landslides, avalanches, rocks, changing water or weather conditions, falling limbs or trees, submerged objects, hazardous plants or wildlife, or other hazards that present risks for which the permittee assumes responsibility.

USE OF EQUIPMENT NOT OWNED BY THE PERMITTEE

- 1) Written notice of intent to use vehicles and other equipment with outfitter markings (company names, logos, etc.) other than those of the permittee (or another outfitter permitted to operate by the Monument) must be made to the Monument office at least one (1) day prior to the scheduled trip. If the markings are those of an outfitter not permitted by BLM, the markings of equipment used must not be visible. The use of unmarked rental vehicles, or such equipment clearly marked as rental, is not restricted by this provision.

ASSIGNMENT, SUBLETTING AND RELATED PROHIBITED ACTS

- 1) The permittee or permittee's representative may not assign, contract, or sublease any portion of the SRP authorization or interest therein, directly or indirectly, voluntarily or involuntarily. However, contracting of equipment or services may be approved by the Monument in advance, if necessary to supplement a permittee's operations. Such contracting should not constitute more than half the required equipment or services for any one trip and the permittee must retain operational control of the permitted activity. If equipment or services are contracted, the permittee shall continue to be responsible for compliance with all stipulations and conditions of the SRP.
- 2) The following list of prohibited acts has been developed to ensure that the permittee outfits and retains operational control of trips conducted under the SRP. Therefore, the Monument may amend, modify, or revoke a SRP upon determining that any of the following have taken place:
 - a) a third party advertisement used to book a trip does not clearly indicate that the trip will be operated by the company holding the SRP.
 - b) the booking agent or advertiser provides both passenger transportation to the public lands and equipment used on the activity.
 - c) the booking agent or advertiser provides more than half of the equipment or livestock provided on the trip.
 - d) more than two (2) representatives or employees of the booking agent or advertiser (employed during the same calendar year) act as guides or crew

- during a trip. Such representatives or employees must constitute less than 50 percent of the crew.
- e) a trip is represented to the participants as being conducted by other than the permittee.
- f) equipment to be used or guide clothing carries the name, markings, or logo of the booking agent or advertiser involved with the trip (this does not apply to booking agents who are permitted outfitters).
- g) the passengers and crew are not covered by the insurance carried by the permittee.

An advertiser or booking agent for the purposes of this section is defined as an individual or organization that advertises or books trips for the permittee but does not hold a SRP to run commercial trips within the Monument. Upon submission of a request from the permittee, the Monument may authorize trips that do not strictly meet the above requirements.

SIGNING AND ADVERTISING

- 1) All advertising and representations made to the public and the Monument must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the SRP fee as a special Federal user's tax. The permittee must furnish the Monument with any current brochure and price list if requested by the Monument.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES GUIDING HUNTERS

- 1) Hunters are prohibited from field dressing game animals within 200 feet of trails and water sources.
- 2) Shooting at rocks, signs, trees, or non-game animals for target practice is prohibited.
- 3) Hunting must be in full compliance with State of Utah and Federal wildlife laws and regulations and the rules of fair chase.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES GUIDING CLIMBERS

- 1) Climbing, bouldering, or any form of canyoneering is not allowed in archaeological sites, on natural bridges or arches, or within identified threatened and endangered species nesting areas.

SUPPLEMENTAL STIPULATIONS FOR PERMITTEES USING RIDING OR PACKING ANIMALS

- 1) Horses or other pack animals are not allowed in relict plant communities, archaeological sites, rock shelters, or alcoves.
- 2) Sheep species are not allowed for pack use.
- 3) Riding and pack stock are limited to 12 animals in the Primitive Zone.
- 4) Only weed free hay, straw and non-germinable grains may be used to feed and bed livestock, or be placed in the bottom of stock carrying vehicles.
- 5) Permittees may not clean out stock trucks or trailers on the Monument.
- 6) Hobbles, pickets, high lines or temporary corrals shall be used to control livestock.

- 7) Riding and pack stock may not be tied to a live tree for more than one hour.
- 8) Riding and pack stock may not be confined within 200 feet of water sources, camp and trails, or 100 feet of an archaeological site. If it is necessary to keep riding and pack stock confined for an extended period of time, select a site where damage to vegetation is minimized.
- 9) All animals will be under control in route and in camp to protect wildlife, other livestock, and range forage.
- 10) Stock may not travel in streams except when crossing.

**SUPPLEMENTAL STIPULATIONS FOR PERMITTEES USING OFF
HIGHWAY VEHICLES AND MOUNTAIN BIKES**

- 1) Permittee will be familiar with and comply with State of Utah law regarding Off Highway Vehicles. All trips and trip participants must follow state regulations and manufacture's recommendations regarding operations.
- 2) Permittees will operate in accordance with 43 CFR 8340, concerning OHV use on public land. Only routes specifically approved in the permittee's operating plan on file with the Monument may be utilized. Permittee must be familiar with the Monument's OHV designations, whether posted on the ground or not.
- 3) OHV operators must yield to non-motorized users. Mountain bikers must yield to pedestrians and pack stock.

Appendix D

Glen Canyon National Recreation Area

SUP Standard Stipulations

CONDITIONS OF THIS PERMIT

1. The permittee shall exercise this privilege subject to the supervision of the Superintendent, and shall comply with all applicable laws and regulations of the area.
2. Damages – The permittee shall pay the United States for any damage resulting from this use which would not reasonably be inherent in the use which the permittee is authorized to make of the land described in this permit.
3. Benefit – Neither Members of, nor Delegates to Congress, or Resident Commissioners shall be admitted to any share or part of this permit or derive, either directly or indirectly, any pecuniary benefits to arise therefrom: Provided, however, that nothing herein contained shall be construed to extend to any incorporated company, if the permit be for the benefit of such corporation.
4. Assignment – This permit may not be transferred or assigned without the consent of the Superintendent, in writing.
5. Revocation – This permit may be terminated upon breach of any of the conditions herein or at the discretion of the Superintendent.
6. The permittee is prohibited from giving false information; to do so will be considered a breach of conditions and be grounds for revocation [Re: 36 CFR 2.32(a)(4)].
7. Permittee will comply with applicable health and sanitation standards and codes.
8. Utmost care shall be exercised to ensure that natural, historic, and cultural features are not injured, and that after the permitted activity is completed the area shall either be cleaned and restored to its prior condition or shall be left in a condition satisfactory to the NPS onsite representative.
9. This permit is made upon the express condition that the United States, its agents, and employees shall be free from all liabilities and claims for damages and/or suits by reason of any injury, or death to any person, or damage to property of any kind whatsoever, whether to the person or property of the permittee, its agents, employees, or third parties, from any cause or causes whatsoever while in or upon park lands or any part thereof during the term of this permit or occasioned by any occupancy or use of park lands or any activity carried on by the permittee in connection herewith. The permittee hereby agrees to indemnify, defend, save, and hold harmless the United States, its agents, and employees from all liabilities, charges, expenses and costs on account of or by reason of any such injuries, deaths, liabilities, claims, suits or losses however occurring or damages growing out of the same.
10. Permittee agrees to reimburse the NPS for any costs associated with issuance and monitoring of this permit. Payment for costs incurred must be mailed or delivered to NPS Headquarters. NPS employees associated with permit activities may not accept payment in the field.
11. This permit may be revoked at the discretion of the Superintendent upon 24 hours notice or without notice if damage to resources or facilities occurs or is threatened, notwithstanding any other term or condition of the permit to the contrary. The permittee will reimburse NPS for cleanup or repair of damages required to be made by NPS staff or contractor in conjunction with the terminated permit.
12. Park staff shall supervise all permitted activities within the park boundaries. This NPS onsite representative(s) possesses authority to make all supervisory decisions to assure compliance with the permit, applicable regulations, and NPS permit policies. The permittee must comply with any special instructions provided by the NPS onsite representative(s) or any requests for additional information.
 - a) Any expenses incurred by the NPS for such supervision shall be borne by the permittee, but may be waived by the Superintendent.
 - b) No employee of the NPS may work for the permittee in any capacity whatsoever while in uniform or if directly involved in supervision of the permittee.
 - c) NPS employees may not perform, or appear to perform, official duties for the purposes of the permitted activity unless such performance has been approved by the NPS.
 - d) No personal gratuity of any nature whatsoever shall be offered to any employee of the Government in connection with the exercise of the privilege granted.
13. The permitted activity must be well planned and scheduled. Last minute changes will not be accommodated unless

the changes are contingent upon weather or other emergency conditions and approved by the NPS onsite representative.

14. This permit does not guarantee exclusive use of parklands. The permit area will remain open to the public during park visiting hours. Permit activities shall not unduly interfere with other park visitors' use and enjoyment of the area. Visitors will be permitted to observe the permitted activity.
15. The permittee shall not depict any situations that conflict with NPS public use regulations.

ADDITIONAL STIPULATIONS

16. Permitted activity (church conference/day hike) is a 1st Amendment activity and all permit and entrance fees are waived. Should the permittee wish to also conduct recreational activities such as a picnic, permit and entrance fees will then be applicable.
17. Permittee is authorized to conduct the permitted activity in the Lees Ferry area, including a hike on Lees Backbone (including parts of the Honeymoon Trail), and a visit to the Lonely Deli Ranch between the hours of 6:30 a.m. and 4:30 p.m. on June 2. The number of people shall not exceed approximately 100 people in groups of a maximum of 25 at one time. The number of vehicles shall not exceed approximately 25 at any one time and will vary depending on group size. Permittee has also obtained the required authorization from the Navajo Nation for this activity.
18. The permit shall be kept on site at all times and will be held by Vickie Jensen(928-645-2879). The NPS liaison for this permit is Patrice Hutton (928-608-6205). Only she or her supervisor may make changes to these stipulations.
19. Permittee shall be responsible for permit compliance by conference attendees.
20. All service participants shall communicate with visitors in a courteous, knowledgeable, and professional manner.
21. Permittee shall not attach anything to any NPS facility, structure, rock or vegetation. Permittee shall not cover or remove signs, fences, or posts, etc.
22. Permittee shall not dig, scrape or remove natural features.
23. Permittee shall not close any roads or rope off any area.
24. All vehicles shall be parked in a designated NPS parking area throughout the day.
25. Following the day hike/conference, the permittee shall clear the permit area of all trash or any other debris return the site to its original condition. Permittee shall make trash receptacles available at all times and shall have participants dispose of trash properly.
26. All law enforcement incidents, accidents, injuries and visitor confrontations shall be reported to the NPS onsite representative or NPS Dispatch at 928-608-6301. For emergencies, dial 911 or 800-582-4351.

Appendix E
Non-Wilderness Lands with Wilderness Characteristics Descriptions

Organized Groups along Hole-in-the-Rock Corridor
DOI-BLM-UT0300-2010-0008-EA

Non-WSA Land with Wilderness Characteristics

Site Evaluation

Tenmile Wash Corral #1 – Located adjacent to HITR road across from Tenmile corrals. Area is impacted by grazing operations. The camp area has a barren core of 1.4 acres; site appears to have leveled by machinery. The area could withstand heavy use without changing the site from its current condition. North Escalante Canyons Unit #8 includes 7,863 acres.



Tenmile Wash Corral #2 – Located off HITS road across from Tenmile corral in North Escalante Canyon Unit 8. This site is on the north side of the road in the drainage. Area is disturbed from grazing operations and camping. The camp area is .41 acres and covered by invasive vegetation: tamarisk, Russian thistle. The area could withstand moderate use without changing the site from its current condition.



Twentymile Corral North - Located adjacent to HTR road across at Twentymile corral this area is on the west side of the Little Egypt, Unit 1 LWC. This area was inventoried in 1999 and found to have no wilderness Characteristics. The 2011 review confirmed that the area has no wilderness characteristics.



Twentymile Corral South - Located adjacent to HITR road at lower Twentymile corral. This area was inventoried in 1999 and found to have no wilderness Characteristics. The 2011 review confirmed this determination was appropriate.



County Line east Camp - Located on Egypt road .25 miles north of HITR road along the Garfield and Kane County line. Area frequently used by general public for dispersed camping and is moderately impacted. The camp area is .25 acres has a small barren core due to vehicle traffic. The area could withstand moderate use without changing the site from its current condition. The Little Egypt LWC unit comprises a total of 22,384 acres.



Big Hollow Windmill - Located approximately 200 yards south of HITS road on the Big Hollow road. Area is impacted from grazing operations and camping. The camp is 1.6 acres, leveled by machinery, and covered by invasive plant. The area shows long term use and could withstand heavy use without changing the site conditions. The impacts and disturbance are clearly identifiable. The area is within the Fifty Mile Mountain, Unit 9, which is 10,575 acres. User conflicts would be reduced because the site is off HITS road. The vehicles and camp will be noticeable but conflicts with other users would be reduced.



Fortymile Ridge - Located adjacent to HITR road, this camp location is an old drill pad site. The camp is 3.4 acres, leveled by machinery, and is covered by invasive plants. The area could withstand moderate use without changing the condition of the site. It has been disturbed and bladed although vegetation has recovered to the point that the area has a natural appearance. The soil is mostly sandy and is not packed down because it has not seen frequent use. Sandy soils will likely show immediate user impacts and will not recover as quickly. The sand raises concerns with a vehicles ability to get in and out without getting stuck. The proposed camp is located in the Hurricane Wash wilderness characteristics area, which includes a total of 9018 acres.



Sooner Wash - Located on a spur route off of HITR road at mile 48. The area is .63 acres, appears to have been leveled by machinery, and shows use of cattle grazing and dispersed camping. The area was inventoried in 1996 and found to have Wilderness Characteristics. The area shows long term use and could withstand moderate use without altering the site from its current condition. 50 mile Mountain, unit 9 contains 12,890 acres of land with wilderness character.



Devils Garden - Located on spur road off HITS road at mile 18. Devils Garden is designated as a WSA. Parking area is developed with 4 small picnic sites, toilet and interpretive panels. Parking area is .25 acres. Hiking trails are moderately developed and will accommodate medium sized groups. Primary group uses would be recreation and hiking.



Appendix F
SHPO Concurrence Letter



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Kanab Field Office
190 East Center St.
Kanab, UT 84741



11-0865

IN REPLY REFER TO:
8100
(UT- 030)

4/15/2011

State Historic Preservation Officer
Utah State Historical Society
300 Rio Grande
Salt Lake City, Utah 84101-1182

PART I. Project Description

County: **Garfield and Kane**
Project Number: **U-11-BL-0061-b**

The following undertaking is located in: (various), in Garfield County. Project Name: **Hole-in-Rock Road Designated Camps**. This undertaking involves the proposed designation of several locations along the Hole-in-Rock Road for use as group camp locations. This undertaking:

<input checked="" type="checkbox"/>	(1) is a interagency project
<input type="checkbox"/>	(2) directly affects a National Register eligible or listed property
<input type="checkbox"/>	(3) has been determined by BLM, the SHPO or the Council to be highly controversial
<input type="checkbox"/>	(4) is one of the following: a land exchange, land sale, Recreation and Public Purpose lease, or transfer
<input checked="" type="checkbox"/>	(5) is one which we wish to bring to your attention

PART II. Determination of Eligibility to the National Register of Historic Places.

BLM requests your concurrence on the following determinations of eligibility and effect:

DETERMINATION OF ELIGIBILITY					DETERMINATION OF EFFECT ON HISTORIC PROPERTIES		
SITE NUMBER	NOT ELIGIBLE	NEED DATA	ELIGIBLE	ELIGIBILITY CRITERIA	NO EFFECT	NO ADVERSE EFFECT	ADVERSE EFFECT
42Ga7127			X	D	No Adverse Effect		
42Ga7128			X	D	No Adverse Effect		
42Ga7129			X	D	No Adverse Effect		
42Ga7130			X	D	No Adverse Effect		
42Ga7133			X	D	No Adverse Effect		

Received
APR 19 2011
USHPO

42Ka4263	X				
42Ka7025			X	D	No Adverse Effect
42Ka7026			X	D	No Adverse Effect
42Ka7027			X	D	No Adverse Effect
42Ka7028			X	D	No Adverse Effect
42Ka7031	X				
42Ka7032			X	D	No Adverse Effect
42Ka7033			X	D	No Adverse Effect
42Ka7034			X	D	No Adverse Effect
42Ka7035	X				
42Ka7036			X	D	No Adverse Effect
42Ka7037			X	D	No Adverse Effect
42Ka7038			X	D	No Adverse Effect
42Ka7039			X	D	No Adverse Effect
42Ka7040			X	D	No Adverse Effect
42Ka7041			X	D	No Adverse Effect
42Ka7042	X				
42Ka7043			X	D	No Adverse Effect
42Ka7044			X	D	No Adverse Effect
42Ka7045			X	A, D	No Adverse Effect
42Ka7046			X	D	No Adverse Effect
42Ka7047	X				
42Ka7048			X	D	No Adverse Effect

BLM Specialists have determined that a finding of No Adverse Effect is appropriate for the above noted eligible sites. These sites are all located in areas that have been used for camping and recreational activities for decades, and some have been used as such since the original Hole-in-Rock trek in 1879-1880. The cultural resource inventories for the proposed camp locations documented these sites, but found almost no diagnostic flaked stone tools; it is presumed that recognizable artifacts such as dart and arrow points have long since been collected from these sites. Currently most of these sites are dominated by ground stone assemblages, and several of the sites also have significant amounts of debitage, but none currently contain artifact types likely to be targeted for collection by camp users. Most of these sites are not in direct association with the proposed camps, but are located in peripheral areas that may or may not see any visitation. Site 42Ka4263 was originally determined eligible, but a site inspection and revisit for this project found that the cabin at that location was burned several years ago, and the site is now considered to be not eligible. Overall these sites are unlikely to be disturbed by the proposed use, but having these sites in close proximity to the proposed

camp locations will result in very close monitoring of these sites and their condition, which would probably occur only sporadically without the camp designations. This will actually lead to an increase in site monitoring, which should be considered a beneficial effect.

BUREAU OF LAND MANAGEMENT, GRAND STAIRCASE-ESCALANTE NATIONAL MONUMENT

 4/15/11
BY MONUMENT ARCHAEOLOGIST DATE

 (Acting) 4/19/2011
BY MONUMENT MANAGER DATE

UTAH STATE HISTORIC PRESERVATION OFFICER

☒ Concur ☐ Do Not Concur
  5.8.11
BY DATE

COMMENTS:

Enclosures

1. Cultural Resources Inventory Report U-11-BL-0061
2. Associated site reports and documentation